

Strategic Environmental Assessment

Land at Gatwick Green



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Contents

1.	Introduction	1
2.	Sustainability Assessment	6
3.	Conclusion	10

1. Introduction

1.1. Crawley Borough Council (CBC) is reviewing its adopted Local Plan (Crawley Borough Council Local Plan (CBLP): Crawley 2030, 2015). This Strategic Environmental Assessment (SEA) is undertaken on behalf of the Wilky Group (TWG). It forms part of the evidence base to support representations on the Regulation 19 consultation on the Draft Crawley Borough Local Plan (DCBLP).

1.2. The DCBLP contains Policy SD3 committing CBC to prepare an Area Action Plan (AAP) covering land that the DCBLP no longer proposes to be safeguarded for a second runway at Gatwick Airport. The purpose of the AAP therefore is to enable the Council to plan for its future economic, housing, infrastructure and community needs, including amongst which are any critical and justified future needs of the Airport. This will be subject to separate consultation and assessment and will include *inter alia* the consideration of land east of the Airport for strategic employment; a site known as Gatwick Green.

1.3. The Council has undertaken a Strategic Environmental Assessment (SEA) and a Sustainability Appraisal (SA)¹, respectively under an EU Directive and under regulations of the Planning and Compulsory Purchase Act 2004 to ensure that the environmental effects of the Plan are taken into account and to satisfy independent examination and allow the Plan to be formally adopted. The SEA contained an assessment of a number of proposed site allocations, but did not cover potential sites within the area covered by the AAP under Policy SD3. Instead, the SEA undertook an assessment of the whole AAP area, which adequately provided a baseline assessment to demonstrate the area's broad suitability to accommodate growth and the key considerations that such growth may need to address. In the context of the Wilky Group's ongoing representations seeking the allocation of Gatwick Green for strategic employment in the event that the proposal for an AAP is not adopted, it is appropriate that evidence is presented to demonstrate the suitability of the Gatwick Green site in sustainability and environmental terms.

1.4. The SEA covers the area of land shown in **Figure 1**, extending to about 59 ha. This site is largely owned by the TWG (80%): areas in which the TWG do not have an interest are subject to ongoing discussions between TWG and landowners. These discussions have resulted in a number of landowners agreeing to bring their land forward for development in the event the overall site is allocated.

1.5. The site comprises an area of mixed land uses dominated by low quality pasture mainly grazed by horses and divided into a number of fields by mature hedgerows. Small areas of tree cover occur in the central and north western part of the site. Clusters of residential and some rural-commercial properties occur along Fernhill Road and Donkey Lane, with some frontage development to Balcombe Road and Peeks Brook Lane. The site is bisected by the Public Safeguarding Zone (PSZ) for the standby runway at Gatwick Airport. Aerodrome safeguarding requirements under CAP 168, the advice note and the Town & Country Planning process by way of ODPM/DfT circular 01/2003 'Safeguarding of aerodromes & military explosives storage areas' Direction 2002 must be adhered to.

¹ SUSTAINABILITY APPRAISAL / STRATEGIC ENVIRONMENTAL ASSESSMENT DRAFT REPORT For the Submission Local Plan, Crawley BC, January 2020

Strategic Environmental Assessment

Land at Gatwick Green

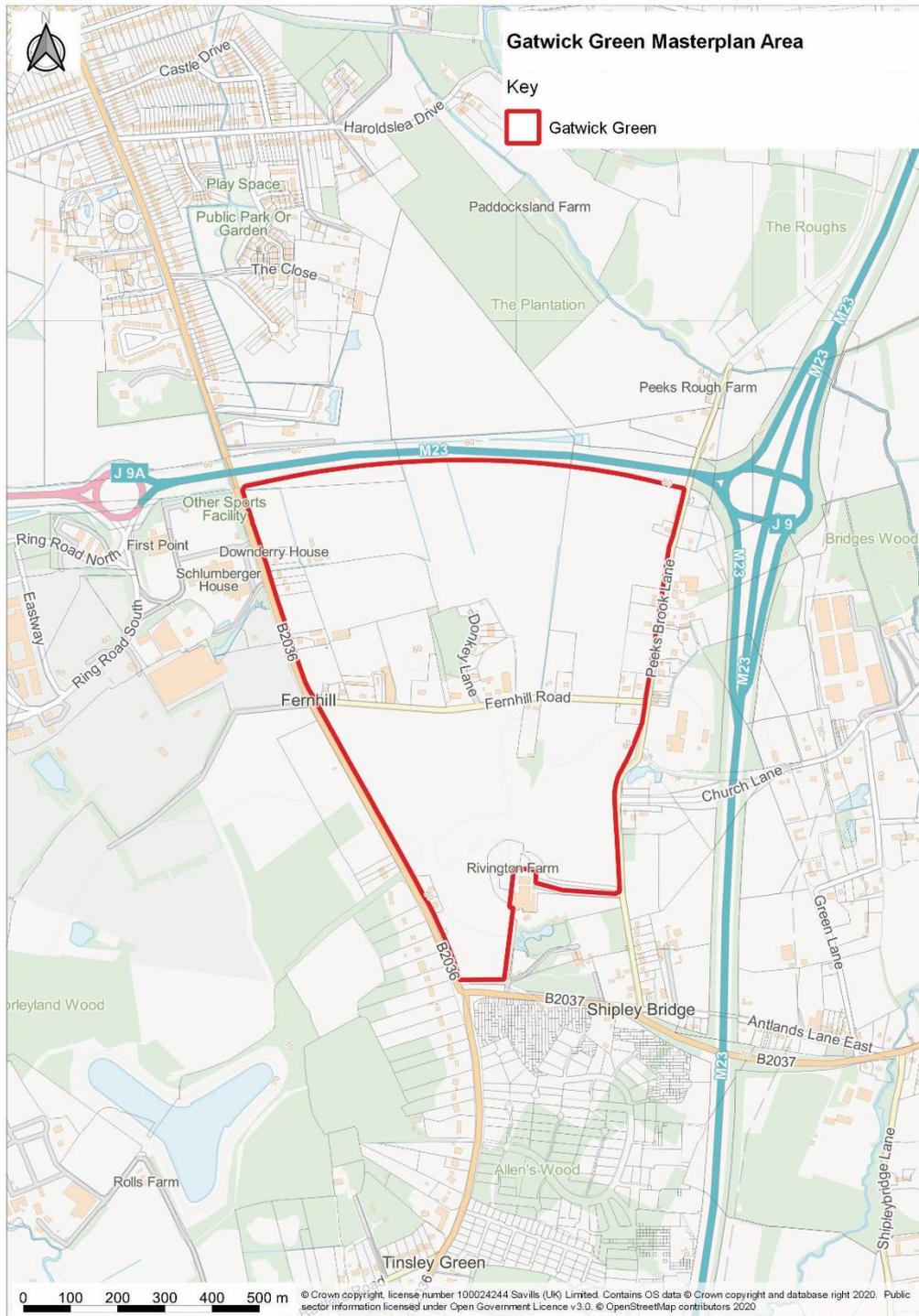


Figure 1 – Land at Gatwick Green

Strategic Environmental Assessment

Land at Gatwick Green



1.6. This SEA report assesses and identifies the likely environmental effects that are likely to arise from the proposed use of land at Gatwick Green for employment purposes. This process involves drawing on available baseline survey data² and identifying the likely positive and adverse effects, and then the broad range of mitigation to reduce the adverse effects. The assessment includes impacts on people’s health and in respect of disability, gender and racial equality.

1.7. The purpose of this SEA is to assess the sustainability of the Gatwick Green site against the Sustainability Objectives used by Crawley Borough Council (CBC) in the sustainability appraisal and strategic environmental assessment draft Report 2020, which are as follows:

- To mitigate climate change, by taking actions to reduce the concentration of greenhouse gases in the atmosphere.
- To adapt to the effects of climate change by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.
- To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.
- To ensure that everyone has the opportunity to live in a decent and affordable home.
- To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.
- To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.
- To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.
- To ensure the provision of sufficient infrastructure to meet the requirements of the borough.
- To promote healthy, active, cohesive and socially sustainable communities. To ensure all benefit from a good quality of life. To ensure everyone has the opportunity to participate in sport and to encourage active lifestyles.

1.8. The methodology for conducting the sustainability assessment evaluated the extent to which Gatwick Green met or could meet the above Sustainability Objectives and then attributed a sustainability rank against each Objective in line with the hierarchy of ranking levels below (Table 1.1) .

Table 1.1 – Sustainability rank hierarchy

	Significant Positive Impact on the sustainability objective (++)
	Positive Impact on the sustainability objective (+)
	Possible Positive or Slight Positive Impact on the sustainability objective (+?)
	No Impact on the sustainability objective (0)
	Neutral Impact on the sustainability objective (/)
	Uncertain Impact on the sustainability objective (?)
	Possible Negative or Slight Negative Impact on the sustainability objective (-?)
	Negative Impact on the sustainability objective (-)
	Significant Negative Impact on the sustainability objective (--)

² Preliminary environmental/engineering investigations contained in technical reports prepared on behalf of WG and submitted with representations on its behalf on the CLP.

1.9. The assessment has drawn on a number of preliminary environmental and engineering investigation reports prepared for the Wilky Group relating to the Gatwick Green site and consideration of the specific proposals for the site contained on the Concept Masterplan for Gatwick Green. The Assessment Criteria were those used in the assessment of site allocations used by CBC in the Sustainability and Strategic Environmental Assessment 2019 (SEA) prepared in support of the DCBLP. The SEA contains the following Assessment Criteria related to each of the nine Sustainably Objectives (Table 1.2):

Table 1.2 – Assessment Criteria

Sustainability Objective	Assessment Criteria
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.	<ul style="list-style-type: none"> • Is the construction of the site going to meet high standards of energy efficiency through the Code for Sustainable Homes (CfSH)? • Is the need to travel reduced through the location of the site? • Is the site contaminated or are there pedestrian pathways linking the site with contaminated land? Can the site be remediated? • Is the development impacted by noise (through adjacent road, airport, rail or industrial usage), or will the site itself result in noise increases? • Will the development site impact negatively or positively on air quality? • Will the development maintain or enhance water quality in rivers or groundwater?
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	<ul style="list-style-type: none"> • Are site proposals located away from areas that are high risk flooding zones, now or in the future? • Are flood prevention measures incorporated into any new development proposal?
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.	<ul style="list-style-type: none"> • Would the development proposal impact upon the setting of a Listed Building, Conservation Area or Locally Listed Building? • If so, could a negative impact on the heritage asset be mitigated appropriately?
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	<ul style="list-style-type: none"> • How does the proposal address housing needs in the borough? • Would the proposal deliver an element of affordable housing? • How does this provision meet the housing needs or the accommodation needs of the GTTS community?
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	<ul style="list-style-type: none"> • Would the development proposal assist in maintaining, supporting or enhancing the local economy of the area?

Sustainability Objective	Assessment Criteria
<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.</p>	<ul style="list-style-type: none"> • Would the development proposal impact upon an existing or future environmental designation (such as a SNCI or AONB)? • Will there be any loss to biodiversity, or damage to the landscape as a result of the delivery of the site? • Will there be opportunities for increasing or enhancing environmental habitats through a development site?
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<ul style="list-style-type: none"> • Is the site proposal located in close proximity to sustainable transport links in order for the occupants to reach essential services and facilities? • Is the need for a 'private' car reduced? • Is the site close to both a pedestrian and/or cycling network?
<p>8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</p>	<ul style="list-style-type: none"> • Would the development increase highway and/or rail usage and would this have a detrimental impact upon highway and/or rail congestion? • What is the capacity of the site to ensure that sewage can be adequately treated? • Would the development site be designed to be connected to high quality telecommunication systems? • Is the site likely to provide additional renewable energy provision as part of the new development? • Is the site close to existing gas/electricity/ water mains? Is there sufficient capacity of current local physical connections?
<p>9. To promote active, cohesive and socially sustainable communities and To ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles.</p>	<ul style="list-style-type: none"> • Are sites located reasonably close to neighbourhood centres and/or community centres? Are the sites located within the Built-Up Area Boundary (BUAB)? • Is the site allocation re-using previously developed land? • Is the site likely to have 'secured by design' principles implemented within the development design? • Is the site located in close proximity to existing leisure and recreation facilities? • Is the site located in close proximity to existing health facilities? • Is the site located in close proximity to existing local schools? • Will amenity areas be provided in association with the site? • Is the potential site capacity of the allocation likely to increase the numbers of users for local facilities (such as schools, GP surgeries) and would this have a detrimental impact upon such local facilities? • Would the development of a site mean the loss of formal or informal playing fields or other open space? Would the development have an impact on existing open space and would this be mitigated?



2. Sustainability Assessment

2.1. Land at Gatwick Green forms part of the land designated as part of the North Crawley Area Action Plan (AAP) area, covered by Policies SD3 and EC1 in the DCBLP. The AAP will address the future socio-economic needs of Crawley and land requirements the related to any planned long term growth of Gatwick Airport.

2.2. The land subject to the Area Action Plan has been subject to a strategic environmental assessment, contained in the Council’s SEA (pages 296-297), December 2019. In this context, the land at Gatwick Green has already been part of an area-based sustainability assessment, which concluded that the AAP area offered largely positive impacts, but uncertain with regard to climate change and negative in relation to biodiversity and landscape. Table 2.1 below shows the results of the AAP assessment alongside the findings of the Gatwick Green assessment. The results show that Gatwick Green has both less risk of adverse impacts and offers more sustainability benefits compared with the AAP area as a whole. This reinforces the importance of Gatwick Green in meeting the economic needs of Crawley and the Gatwick Diamond/LEP area, but in a highly sustainable manner.

Table 2.1 – Sustainability Assessment – AAP area and Gatwick Green

Sustainability Objective	AAP Assessment	Gatwick Green Assessment
1. To mitigate climate change, by taking actions to reduce the concentration of greenhouse gasses in the atmosphere.	Uncertain impact (?)	<p>Land at Gatwick Green is located beyond the Built Up Area Boundary. It comprises majority greenfield land with a clusters of commercial properties and groups of residences. This location means economic development would potentially increase the need to travel to access employment opportunities. However, the land is adjacent to existing employment sites served by public transport and is well-located for access by public transport, walking and cycling. The strategic nature and scale of the site provides the opportunity to access the site via an integrated sustainable transport solution. The scale of development would also enable a high level of sustainable design and construction to significantly reduce or avoid climate change impacts.</p> <p>The scale of Gatwick Green combined with its sustainable location adjacent to three Fastway routes offers some more scope to avoid / mitigate climate change than the AAP area as a whole.</p> <p>The impacts would therefore be Possible Positive Impact +?.</p>
2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change.	Possible Positive Impact +?	<p>Identification of employment sites that are well connected to existing Main Employment Areas (e.g. Gatwick), represent the most sustainable options. Development on land at Gatwick Green could be designed to be resilient to climate change. The scale of development at Gatwick Green offers an opportunity for strategic level new build that has a high level of sustainable design in order to facilitate adaptation to climate change. On this basis, it is considered that development could offer significant scope to respond positively to climate change through the planning process.</p> <p>In relation to climate change adaptability, Gatwick Green has similar attributes / characteristics to other land parcels in the AAP area.</p>

Strategic Environmental Assessment

Land at Gatwick Green



Sustainability Objective	AAP Assessment	Gatwick Green Assessment
		The impact would therefore be Possible Positive Impact +? .
3. To protect and enhance the valued built environment and character within the borough through high quality new design and the protection of culturally valuable areas and buildings.	Possible Positive Impact +?	<p>There is an identified need for high quality business land and floorspace in Crawley which will likely exceed that which can be provided by sites within the Built Up Area Boundary. Local Plan policies will require high standards of design to be met which respond to their surroundings and protect and enhance culturally valuable areas and buildings. Development on the Gatwick Green site would therefore be required to enhance the overall aesthetics of the local built environment and provide the opportunity for positive impacts.</p> <p>In relation to enhancing the built environment and protecting cultural assets, Gatwick Green has a similar capacity to contribute to this objective compared to the AAP area as a whole.</p> <p>The impact would therefore be Possible Positive Impact +?.</p>
4. To ensure that everyone has the opportunity to live in a decent and affordable home.	Possible Positive Impact +?	<p>As an employment site, Gatwick Green will not directly deliver decent and affordable homes. However, the provision of this land for employment ensures this need is met in a sustainable location, so contributing to balancing jobs with new homes in a sustainable manner. For this reason, land identified for Gatwick Green is viewed as having an uncertain, but potentially positive impact against this indicator.</p> <p>In relation to ensuring everyone has access to a decent and affordable home, Gatwick Green would ensure a balance between homes and jobs which is similar to the balance that the AAP area could achieve.</p> <p>The impact would therefore be Possible Positive Impact +?.</p>
5. To maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.	Possible Significant Positive Impact ++?	<p>As an employment site, land at Gatwick Green provides a high profile site for high quality business-led employment development in a highly sustainable location. The site will address the need for high-quality Strategic Employment Locations (SEs), employment space and support sustainable economic growth in the area. Gatwick Green is also uniquely placed to diversify the area's employment base given its ability to attract alternative occupiers to those normally locating at Manor Royal: in that sense it would have a high degree of complementarity with Manor Royal and help to rebalance the economy. The site therefore presents a significant opportunity to accommodate the business needs of Crawley and the wider region at a strategic location adjacent to the Airport, the M23, mainline rail and Fastway, so reinforcing the area's role as the leading employment destination in the Gatwick Diamond. Gatwick Green offers more scope to deliver these benefits than other parts of the AAP area.</p> <p>Gatwick Green has an enhanced capability to promote a diverse economic base to support the local and sub-regional economy similar to that of the AAP area as a whole, but greater than other locations with the area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++.</p>

Sustainability Objective	AAP Assessment	Gatwick Green Assessment
<p>6. To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough.</p>	<p>Possible Negative Impact -?</p>	<p>The site is not subject to any statutory landscape or nature conservation designations, but local landscape values and biodiversity have been recognised in policies in the adopted CBLP. Whilst it may have slightly higher values than other parts of the AAP area, some of those areas are subject to statutory nature conservation designations. The development of land at Gatwick Green for employment use could have a negative impact on biodiversity, landscape features, flora and fauna. However, the strategic size of the site presents an opportunity to mitigate impacts on biodiversity or provide compensation. Such mitigation or compensation could be inherent or additional, either as part of the scheme or on other land in Wilky's ownership. Development of the site will in any event need to comply with future requirements to deliver Biodiversity Net Gain, presenting the opportunity to enhance habitats and landscape features.</p> <p>Compared to the AAP area as a whole, Gatwick Green has a slightly higher level of biodiversity value, but is not affected by any statutory nature conservation designations: its therefore has a marginally greater potential to mitigate or compensate impacts and deliver biodiversity net gain compared with the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?.</p>
<p>7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.</p>	<p>Possible Positive Impact +?</p>	<p>Land at Gatwick Green is located beyond the Built Up Area Boundary which means economic development would potentially increase the need to travel to access employment facilities. However, Gatwick Green is situated in a highly sustainable location adjacent to the Airport, the M23, mainline rail and Fastway, so offering significant scope for highly sustainable arrangements for access. This location combined with the sale of development proposed, creates the opportunity for the wider provision of sustainable transport infrastructure at the site and in adjacent areas. This would make the development highly accessible by sustainable modes of transport, including Fastway, local bus services, walking and cycling. Such arrangements could benefit nearby employment areas and the Airport. Further, the provision of higher value and more diverse job opportunities would help to retain employees in an area that is overly reliant on low skilled jobs at the Airport and elsewhere: this will help to reduce levels of less sustainable out-commuting to London.</p> <p>Gatwick Green is located at the most accessible location in the AAP area with greater scope to reduce out-commuting to London; consequently, it has a higher sustainability profile that other parts of the AAP area.</p> <p>The impact would therefore be Possible Significant Positive Impact ++.</p>

Sustainability Objective	AAP Assessment	Gatwick Green Assessment
<p>8. To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</p>	<p>Possible Positive Impact +</p>	<p>The development of land at Gatwick Green for employment use will require a range of infrastructure to address transport, energy, renewable energy, utility, broadband/5G and social needs. The scale of development at Gatwick Green offers the opportunity for innovative and high quality infrastructure to address these needs - these will meet the needs of proposed development and could help meet wider requirements of the borough. The potential of Gatwick Green in this regard is likely to be higher than that of the AAP area as a whole.</p> <p>Aerodrome safeguarding requirements must be adhered to, including a PSZ for the standby runway at Gatwick Airport. However, this does not represent a constraint to the site being developed as the safety limitation surfaces under these requirements are of significant height and limitations in regards to lighting can be addressed in design.</p> <p>The scale and high value of Gatwick Green offers the opportunity for greater innovation and quality of infrastructure to meet wider needs compared with the potential in the AAP area as a whole.</p> <p>The impact would therefore be Positive Impact +.</p>
<p>9. To promote active, cohesive and socially sustainable communities and to ensure everyone has the opportunity to participate in sport and to encourage active, healthy and independent lifestyles.</p>	<p>Possible Positive Impact +?</p>	<p>The strategic nature of land at Gatwick Green presents the opportunity to enhance bus, pedestrian and cycle links to nearby communities and offers scope to encourage healthy lifestyles through the design of such links and provision within the built environment. The scale of the proposed development also offers opportunities to incorporate a range of employee amenities and community uses, from sports, to leisure and recreational uses. The proposals also have the capability to offer higher value jobs, so helping to diversify the economy and create more socially-sustainable communities. Such benefits are not, however, exclusive to Gatwick Green as the AAP area as a whole offers similar opportunities.</p> <p>Gatwick Green has a similar capability to contribute towards cohesive and socially sustainable communities and provide for sport and recreation, which is similar to the capability of the AAP area.</p> <p>The impact would therefore be Possible Positive Impact +?</p>
<p>Conclusion</p>	<p>-</p>	<p>As an extension to the Main Employment Areas of Manor Royal and Gatwick Airport, or as a standalone site(s) for Strategic Employment Location(s) to meet the business land needs of Crawley as a sub-regional employment destination, land identified for the AAP represents the most sustainable location for strategic employment growth in Crawley. Some areas within the broadly identified area will be more sustainable than others – this applies to Gatwick Green given its scale, location, attributes and high profile, which means it has a higher sustainability profile compared to the AAP area. Overall, it would enable highly sustainable, high quality new development to complement and deliver linkages with the existing residential and business communities.</p>

3. Conclusion

3.1. In order to provide a profile of the relative sustainability of the Gatwick Green site compared with the AAP area as a whole, an evaluation has been undertaken using the same approach and method adopted in the Council's SEA. The site has therefore been assessed against the nine Sustainability Objectives taking account of the assessment criteria as set out in the SEA.

3.2. The strategic environmental assessment of Gatwick Green has demonstrated that the site offers the capability to meet the identified need for strategic, high-quality employment space in Crawley to serve the wider region in a highly sustainable manner. It would enable highly sustainable, high-quality new development to complement Manor Royal and the Airport and deliver important linkages with the existing residential and business communities in the Borough. Overall, the site has the following attributes: limited environmental and landscape values; significant opportunities for biodiversity gain; an opportunity to rebalance the local economy and reduce out-commuting; contribute towards the quality of the built environment; provide sustainable transport modes that benefit the wider area; deliver socio-economic benefits; minimise impacts on climate change, but build in resilience to the same; deliver sub-regional economic objectives, and incorporate innovative infrastructure to provide local benefits.

3.3. These attributes largely arise from the size, location and high profile of Gatwick Green, which means it has a higher sustainability profile than the Area Action Plan area as a whole. It therefore provides the opportunity for a strategic employment location which can be brought forward efficiently and sustainably to deliver significant socio-economic benefits to communities across Crawley and Reigate and Banstead in the event that the proposal for an AAP in the DCBLP is not adopted.

Strategic Environmental Assessment

Land at Gatwick Green



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