



Historic England

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Date 27 February 2020

[By email only to forward.plans@crawley.gov.uk](mailto:forward.plans@crawley.gov.uk)

Dear Sir or Madam

### Crawley Submission Local Plan Regulation 19 Consultation

Thank you for your email of 20 January 2020 inviting comments on the above consultation document.

As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.

There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate. In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the plan; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment.

The objective of the National Planning Policy Framework, inter alia, to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 185); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 20 d)). These underpin the purpose of the planning system to achieve sustainable development.



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We welcome the statement within the **Crawley 2035: A Vision** section that '*The rich heritage which has shaped what the town is today will be respected, protected and enhanced*'. We support the overarching policy in this respect, **Strategic Policy SD1: Presumption in Favour of Sustainable Development** that includes recognition of this in bullet point 3.

A positive strategy in the terms of the NPPF is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.

We have no objection in principle to the designation of **Strategic Policy SD3: North Crawley Area Action Plan** but it should be noted that there are a number of designated heritage assets (listed buildings and scheduled monuments) within the defined area that would need to be taken account of in future planning of the area. This includes, in particular, listed buildings within and adjacent to the 'Indicative Search Corridor for the Western Link Road (Policy ST4)'.

We note, and support, that **Strategic Policy CL2: Making Successful Places: Principles of Good Urban Design** requires good design that reflects the defining characteristics of each neighbourhood within the plan area, and that reinforces the existing character and distinctiveness of each; and, that the protection and enhancement of heritage assets is integral to this.

We support **Strategic Policy CL3: Local Character and Design of New Development**; particularly in its reference to protecting, enhancing and reinforcing 'heritage assets and their settings'.

The location, design and use of future development can contribute to local identity and distinctiveness, and safeguarding heritage significance. We agree that **Policies CL4-CL6** set out a series of design parameters that will help to ensure that high-quality design is achieved in new development and sustainable forms of urban planning are delivered, including the protection of heritage assets.

We support **Strategic Policy CL7: Important and Valued Views** and the supporting reasoned justification that seek to protect views of heritage assets and within historic areas.

**Strategic Policy CL8: Development Outside the Built-Up Area** is supported.

In **Strategic Policy DD1: Normal Requirements of All New Development** we suggest inclusion of a reference to heritage in bullet **b**); e.g. 'Retain and reuse existing buildings occupying a site or demonstrate why this is not feasible, viable or desirable. This is particularly relevant in the case of building, structures or landscape features *that are of heritage significance or* contribute to local character, setting and context'.





We support **Non-Strategic Policy DD7: Advertisements** in its references to considering the effects on the character of the locality, including ‘scenic, historic, architectural or cultural value or features’ in sub-paragraph a).

We support the broad intention of **Strategic Policy HA1: Heritage Assets** but suggest the following amendments to strengthen the purpose of the policy and better reflect the intentions of the NPPF:

Revise the final bullet point of the first paragraph to read *Other assets with non-designated archaeological interest, assets of equivalent significance to scheduled monuments, especially within Archaeological Notification Areas in Crawley identified by West Sussex County Council* to reflect NPPF paragraph 194 and footnote 63.

In paragraph 2 replace ‘not lost’ with *conserved and enhanced* to meet the test of NPPF paragraph 194.

Add into paragraph 4 – ‘If, in exceptional circumstances, *as defined by paragraph 194 of NPPF*, .....and it has been demonstrated *to achieve substantial public benefits that outweigh that harm or loss,...*’ to reflect the intention of NPPF paragraph 195.

Amend paragraph 5 to: ‘In *exceptional* cases where a heritage asset is considered to be suitable for loss or replacement, ~~and it has been demonstrated its site is essential to the development’s success~~ *by being in accordance with the above criteria*, proposals will be subject to a requirement to record the asset(s) concerned. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the council in advance of its implementation and will reflect the importance and nature of the asset and the impact of the proposal’. This wording would better reflect NPPF paragraphs 195 and 196.

We support policy **Strategic Policy HA2: Conservation Areas**.

**Strategic Policy HA4: Listed Buildings and Structures** is supported.

**Strategic Policy HA7: Heritage Assets of Archaeological Interest** is supported.

**Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road** – see comment above. Heritage assets are likely to be impacted by a road in the area indicated in the map on page 214 and these should be factored into any assessment of the appropriate route alignment.

We would like assurance that an up-to-date Evidence Base exists for the historic environment elements of the Crawley Local Plan or that such is in preparation. Paragraph 1.14 of the draft Local Plan includes reference to ‘ASEQs and Locally Listed Buildings Heritage Assessment; ... Landscape Character Assessment; Historic Parks & Gardens Review; ...’ which date from 2010,



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2012, and 2013 respectively. We have been unable to locate any other directly relevant more recent reports or studies. Paragraph 6.8 et al refer to the Crawley Heritage Strategy (2008), but no update to this appears to exist. The only other reference to possible evidence is given in footnote 61 on page 78.

A Heritage Topic Paper or similar assessment document prepared in advance of, or alongside (if not already undertaken), the local plan can be a useful tool to amplify and elaborate on the delivery of the positive heritage policies in the Local Plan. Some local planning authorities have chosen to support their conservation strategy within the Local Plan using a topic-specific SPD.

These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.

If you would like further advice on the content of this letter or to discuss how the draft Local Plan could be revised to better reflect the intention of the NPPF, please contact me.

*Yours sincerely*

**Alan Byrne**  
Historic Environment Planning Adviser



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Date 27 February 2020

Dear Sir or Madam

### Crawley Local Plan Strategic Environmental Assessment Scoping Report

Thank you for your email of 20 January 2020 inviting comments on the Scoping Report for the above strategic environmental assessment.

Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the scoping report for Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.

Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here:

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>.

This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.

*Yours sincerely*

**Alan Byrne**  
Historic Environment Planning Adviser



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