



# 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](mailto: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](http://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](http://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:	C/O agent	Mr
First name:		David
Surname:		Hutchison
Organisation:		Pegasus Group
Address line 1:		Pegasus House

Address line 2:

Whitworth Road

Town/city:

Cirencester

Postcode:

GL7 1RT

Telephone:

01285 888027

Email:

[david.hutchison@pegasusgroup.co.uk](mailto:david.hutchison@pegasusgroup.co.uk)

## PART B – Your representation

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

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

### 4. Which part of the Local Plan does this representation relate to?

Paragraph: See attached

Policy: See attached

Other:

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

5.1. Legally compliant?

Yes

No

5.2. Sound?

Yes

No

5.3. Compliant with the duty to co-operate?

Yes

No

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

Please see the attached representations letter

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

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

Please see the attached representations letter

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

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

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

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

Yes, I wish to participate in the examination hearings

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

Please see the attached representations letter

*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](http://www.crawley.gov.uk/crawley2035)

**Signature**



**Date**

06.03.2020

MK/CIR.P.0571

2<sup>nd</sup> March 2020

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

Dear Sir/ Madam,

**Crawley Borough Council Local Plan Review 2020-2035 Regulation 19 Public Consultation- Representations on behalf of Persimmon Homes Plc**

Following our representations in relation to the Local Plan Regulation 18 consultation on behalf of our Client Persimmon Homes Plc, Pegasus wish to submit representations to the Crawley Borough Council Local Plan Review 2020- 2035 Regulation 19 Public Consultation.

On behalf of our client, Pegasus would like to make the following representations on the draft Plan.

**Housing Provision across the Borough**

1. **Strategic Policy H1: Housing Provision** states the Council have a positive approach in considering proposals for residential developments and will take a pro- active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible.
2. The policy rightly acknowledges that the Council will **not** be able to meet its own needs.
3. The policy estimates the Local Plan will only be able to make a provision for the development of 5,355 dwellings across the plan period (2020-2035). Consequently, it will result in a 5,925 dwelling shortfall over the Plan period.
4. The policy indicates that all reasonable opportunities will be considered for residential developments, including parcels of brownfield land or surplus green spaces as long as consistent with other Local Plan Policies. Pegasus Group welcomes this approach and the attempt to secure more development within the Borough where possible.

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5. **Strategic Policy H2: Key Housing Sites** lists a number of sites allocated for a residential delivery. The Policy points out that the listed sites are critical to the delivery of housing development across the Plan period.
6. The policy indicates that Forge Wood Masterplan area is considered to be an area deliverable within the first five years of the Plan (2020/21-2024/25) and has an outstanding 1,270 dwellings to be delivered by 2027/28. The importance of the Forge Wood area is emphasised in the introduction section of the plan and Persimmon Homes has ongoing interests in this part of the Borough. The foreword section of the document states the following

***"To meet the needs of its growing population and its key economic role at the heart of the Gatwick Diamond, by 2035 Crawley would need to provide over 11,200 more homes, generating up to 20,541 new jobs. <...> Forge Wood is the last full neighbourhood which can be built within the borough boundary as there is simply no space left."***

7. The supporting text at paragraphs 12.35-12.37 provides further information on the Forge Wood area. It identifies that the new neighbourhood is currently under construction and will result in a total of 1,900 new dwellings alongside associated infrastructure. It identifies that there may be opportunities within the masterplan area to consider further smaller-scale housing development beyond the 1,900 committed dwellings. The infill proposals would be subject to a number of additional considerations including infrastructure capacity, open space and amenity requirements, biodiversity and ancient woodland, and the requirements of Policy EP4 relating to noise affected areas.
8. As a part of Crawley Borough Council Local Plan Regulation 18 Public Consultation held in September 2019, Pegasus Group, on behalf of Persimmon Homes highlighted five parcels of land within the Forge Wood Area that were identified by the Persimmon Homes as available and suitable for development. These are presented on the appended (shown as highlighted against the background context of the approved Forge Wood Masterplan) and remain available for development.
9. The Crawley 2035 Local Plan Map published by the Local Authority as a part of Regulation 18 Consultation identified the entirety of the Forge Wood Area as a site subject to the Policy H2: Key Housing Sites.
10. The Policies Map has now changed and this leads to some confusion about where development will be supported.
11. The whole Forge Wood Neighbourhood is shown cross hatched and the key cross refers to Policy H2. However, the Key Housing Sites are shown in red but cover a reduced area

whilst still cross-referring cross to Policy H2. The question therefore arises over which area Policy H2 is to be applied to.

12. If it is the red area then the Regulation 19 Consultation appears to reduce the extent of the allocated area.
13. The previous set of representations submitted by Pegasus Group in relation to the infill sites across the Forge Wood Neighbourhood area (as shown on the attached masterplan) provided an indication of the development locations. It did not specify the proposed use types however, the sites put forward in these representations were expected to comprise a mix of uses, including residential and non- residential development options. The overarching objective was to maximize the potential of the land available and suitable for the development in the Forge Wood Neighbourhood.

### **Sites within the built up area**

14. **Strategic Policy H3B: densification, Infill Opportunities and Small Sites** states that Densification and development on infill and small sites in Crawley will be supported, subject to further requirements set out in the Policy. The policy supports the Council's approach in Policy 1: Housing Provision, whereby the Council is seeking to maximise the existing opportunities across the Borough. The policy supports densification and infill or small site developments across the Borough. Pegasus Group welcomes this approach that further reflects the spirit of the Government's approach and is in line with the national policy.
15. This policy may overcome the confusion noted above regarding Policy H2 in the Forge Wood area. However it would be preferable to omit reference to small sites and instead allow Policy H3B to apply to all sites within the built up area (subject to normal other development control criteria).

### **Housing Mix**

16. **Strategic Policy H4: Future Housing Mix** provides a detailed mix of dwelling types and sizes to address the nature of local housing needs and market demand that is sought by the Borough Council. The policy relates to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley. Paragraph 13.14 sets out the recommended mix across all priority bandings and affordable tenures.
17. Pegasus does not dispute the affordable housing mix where this is based on need assessments.

18. Nevertheless, Pegasus Group does oppose the following approach in determining the mix for the private sale of private rent units. The 60% market housing element breaks down the recommended mix between Town Centre location and Borough- wide locations.
19. Pegasus Group considers that the LPA does not need to interfere with the market housing mix and that this should be left to developers who have a better understanding of changing trends.

### **Development and noise**

20. **Strategic Policy EP4: Development and Noise** states that People's quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources.
21. The policy indicates that residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses. The policy allows noise sensitive used in areas that are exposed to Lowest Observed Adverse Effect Level (LOAEL) or the Significant Observed Adverse Effect Level (SOAEL) to be permitted subject to a good acoustic design consideration in the early planning process, sufficient mitigation, careful planning and appropriate layout and design implemented. The policy further identifies that

***"for aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr."***

22. The proposed sites put forward by Pegasus on behalf of Persimmon Homes identify a number of land parcels in the northern areas of the Forge Wood Neighbourhood and an infill site to the south of the area. Noise annex figure 1: the proposed wide spaced runaway contours from Gatwick Airport's 2019 master plan indicates a Gatwick airport noise contour 2 runaway scenario. It identifies that the entirety of the Forge Wood area is subject to 54- 66dB noise exposure. The southern part of the Forge Wood Neighbourhood is subject to the lower levels of noise (54-60dB) and therefore the principle of the development is not precluded in such locations.
23. Therefore, the area is broadly compliant with the Policy EP4 and hence does not preclude development occurring in the above locations. In some areas beyond the current consented scheme they could however be affected more by noise and this will influence what land uses they are best suited to, and non-residential options should be considered.
24. The four land parcels to the north of Forge Wood are more likely to affected by existing and potential future noise arising from Gatwick Airport. Nevertheless, it is expected that the Council will be willing to work towards securing a suitable solution and maximise the potential of Forge Wood neighbourhood area in maximising the development opportunities. Contours set out in the Policy map submitted as a part of Regulation 19



consultation does not allocate the land for development. It was previously highlighted that, in the locations where noise levels exceed the levels that the LPA consider to be appropriate for housing, Persimmon are open to bringing that land forward for employment or other less noise sensitive uses. Pegasus Group would therefore like to highlight the appended parcels of land are suitable and available for a development.

### **Design and mix of the development**

25. **Strategic Policy CL2: Making Successful Places: Principles of Good Urban Design** sets out a guidance on the urban design and issues. The policy identifies a number of requirements that the development proposals will be required to satisfy. The Policy however makes no reference to the National Design Guide that was published in 2019. It sets out a design framework endorsed at a national level.
26. The policy further identifies that the development proposals must identify, test, determine and (subject to outcome) embrace, opportunities for increased density, where appropriate and subject to Policies CL3 and CL4. The policy does not set out the minimum densities that need to be achieved through the proposals.
27. The setting of residential density standards identified in the Crowley Borough Plan should be undertaken in accordance with the paragraph 123 of the National Planning Policy Framework which states that in the circumstances of an existing or anticipated shortage of land for meeting identified housing needs then a minimum net density in suitable locations such as town centres and those benefiting from good public transport connections may be appropriate. Point B of the paragraph 123 states that

***"the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range"***

28. It is therefore argued that the Strategic Policy CL2: Making Successful Places should clearly set out the design requirements in accordance with the NPPF 2019.

### **Electric Vehicle Charging Infrastructure**

29. Strategic Policy ST2: Car and Cycle Parking Standards states that the development will be permitted where the proposals provide an appropriate amount of parking facilities. The policy indicates that the standards are set out in the Parking Standard Annex. Crawley Local Plan Parking Standards Annex provides a brief overview of the Electric Vehicle (EV) Charging Infrastructure. The following section states that until the introduction of national requirements for EV charging infrastructure in new

developments, Crawley Brough Council will require the provision of 'Active' charging points for electric vehicles should be provided at a minimum of 30% of all parking spaces. The section further states that

***"for planning applications registered in each calendar year following the adoption of the Local Plan, the proportion of parking spaces with active EV charging provision should increase by 4 percentage points, to reflect anticipated increases in demand".***

30. Whilst Pegasus Group supports promotion of the use of electric and hybrid modes of transport, it is argued that the following policy should accord with the Building Regulations. The Strategic Policy ST2: Car and Cycle Parking Standards and the Parking Standards Annex do not provide any further justification of the following requirements nor it identifies the actual evidence providing demand or technical feasibility assessments. There is no indication in the EV Charging Infrastructure requirements are responding to the actual or future demand for this type of infrastructure locally.

I would be most grateful if you could acknowledge receipt of these representations and advise on the likely timetable for the next steps for preparation of the Crawley Local Plan.

I look forward to hearing from you with regards to these matters.

Your Faithfully,



**Marcin Kulesza**  
Planner

Enc. Appendix 1- Masterplan



**\* - Additional land available for the development**