



# Crawley Local Plan

<p><b>Ref No:</b></p>   <p><i>Office use only</i></p>
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## Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to [strategic.planning@crawley.gov.uk](mailto:strategic.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 [here](#).

### 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	
First name:	Ken	
Surname:	Glendinning	
Organisation:	Homes England	
Address line 1:	5 <sup>th</sup> Floor, Town Hall	

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 see attached letter to email.

- 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.

### 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.

*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:**

Homes England would like to participate at the Examination in Public if deemed necessary by CBC. The main matters we would like to participate in would be on CWLR Safeguarding and noise.

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

**Signature**

Ken Glendinning

**Date**

29.06.2021



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

29th June 2021

Dear Sir / Madam

**CRAWLEY BOROUGH COUNCIL, LOCAL PLAN REVIEW, REGULATION 19-  
JANUARY 2021**

Please find enclosed at Annexe A representations to Crawley Borough Council's (CBC) Draft Local Plan Review 2021 – 2037 (Regulation 19 2021) (the **Draft Crawley Local Plan**).

Homes England is responding in its capacity as the Government's housing accelerator and as a major landowner / promoter with significant land interests to the West of Ifield, which fall both within and adjoining the Borough boundary. Where necessary, separate responses will be submitted by Homes England in relation to its other interests.

The potential for West of Ifield as a strategic allocation is being promoted through the preparation of the Horsham Local Plan review. However, it has been recognised that any development to the West of Ifield can make a positive contribution to objectives of the Draft Crawley Local Plan and any future planning application will need to demonstrate how it has taken account of and responds positively to the relevant policy requirements set out in the Draft Crawley Local Plan.

**Previous representations**

Our representations at Annexe A supersedes our previous Regulation 19 representation dated 2 March 2020 made in relation to the previous iteration of the Draft Local Plan

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which was published for consultation between 20 January 2020 and 2 March 2020 (our **Previous Representation**).

### **Summary of representations**

The key areas that Homes England consider could impact the soundness of the Draft Crawley Local Plan are set out within this representation and summarised as follows:

- GAT2: The introduction of blanket Safeguarding (GAT 2) which, unless clarified, directly conflicts with Policy ST4 and has the potential to undermine the delivery of the Western Link. Further supportive text within the Draft Crawley Local Plan is required to direct how policy conflicts and proposals will be managed, with further work needed to fully understand the requirements of both the Link Road and Gatwick expansion. Furthermore, in light of the challenges facing the aviation sector, and likely timescales of the southern runway, it is not clear whether the basis for the safeguarding boundary as currently set out is fully justified;
- CL8: The policy should recognise the need for housing across the wider area and potential relationship to wider housing growth in line with other policies and HDC Local Plan Regulation 18 as 'West of Crawley'. The policy should recognise the importance of connectivity and the opportunity to contain essential links to new sustainable urban extensions outside of the built up area;
- Paragraph 12.23: the supportive text in connection with the Western Link Road should allow for scoping, design and delivery to be informed as application stage by transport evidence and assessments with potential for phased delivery. The provision of affordable housing targets also should be removed in the context that these shall be the responsibility of other local authorities and potentially creates unnecessary conflict;
- ST4: WLR safeguarding zone and consideration of the Charlwood Road / Western Link Junction providing access to West of Ifield. The safeguarding of the Western Link is supported. However, in addition to facilitating application stage by transport evidence and assessments with potential for phased delivery, the policy should provide reference to the potential need for land acquisition and assembly mechanisms;
- EP4: Night time Noise Contours and the lack of flexibility in approach to permitting development. The policy should be amended so as to allow a more flexible approach to permitting development is required within the 60dB  $L_{Aeq,16hr}$  (proposed) – 66dB  $L_{Aeq,16hr}$  contour

Homes England considers that actions are necessary to address the above to ensure that the Draft Crawley Local Plan is sound or to provide further clarity on how the policies will be applied to future development proposals.

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 Draft Crawley Local I Plan and progression towards Examination. Homes England would like to participate at the Examination in Public if deemed necessary by CBC. The main matters we would like to participate in would be on CWLR Safeguarding and noise.

Yours faithfully,

A handwritten signature in black ink, appearing to read 'Ken Glendinning', written in a cursive style.

**Ken Glendinning FRICS**

Project Director

Homes England

[Ken.Glendinning@homesengland.gov.uk](mailto:Ken.Glendinning@homesengland.gov.uk)



**Annexe A**

**Draft Crawley Local Plan Regulation 19 (2021)  
Homes England Representations**

**Introduction**

Homes England is 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 homes happen, 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 and is deploying our knowledge and delivery expertise to ensure that the scheme comes forward to meet local ambitions. Homes England has a strong track record in acting as a 'master developer' on schemes such as the Northern Arc in Burgess Hill and Northstowe in Cambridgeshire.

**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 Crawley Local Plan to confirm our position in respect of the land interests described within this representation. Homes England also confirms herewith that at this time it wishes in due course to participate in the relevant sessions of the public examination.

The content of this representation therefore sets out our position of support for the Plan as a whole and identifies the changes considered necessary to make the Plan sound or provide further clarity on how the policies will be applied.

Where amendments are proposed, these are considered necessary to ensure that the Draft Crawley Local Plan fully meets the soundness test as set out in the National Planning Policy Framework (NPPF) (paragraph 35). Meeting these tests will ensure that the Draft Crawley Local Plan is positively prepared, justified, effective and consistent with national policy.

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## Documents reviewed

In preparing these representations, the following documents have been reviewed:

- Crawley submission Draft Local Plan (January 2021)
- Draft Sustainability Appraisal (January 2021)
- Northern West Sussex Strategic Housing Market Assessment Final Report (November 2019);
- Infrastructure Plan (January 2021)
- North West Sussex Statement of Common Ground (May 2020)
- Draft Duty to Cooperate Statement (March 2021)
- Topic Paper 1: Unmet Needs and Duty to Cooperate
- Topic Paper 2: Gatwick Airport
- Topic Paper 7: Development and Noise Technical Appendix
- Crawley Transport Study (May 2021)

## Homes England Land Interests

Homes England own key sites which fall within the Crawley 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 Homes England's interests at West of Ifield and therefore other landholdings are not described. Separate representations for the other sites have been submitted where necessary.**

### Land West of Ifield

This site comprises a specific priority in Homes England's Strategic Plan 2018/19 to 2022/23<sup>1</sup>. The objective is to progress the promotion of Land West of Ifield as a strategic growth area for up to 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 during 2022/23.

All the land being proposed for built 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 (Policy GI2) and Local Green Space (Policy GI4)).

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 majority control of Homes England following acquisition of land from Ifield Golf Club Ltd in November 2020.

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



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**

Land West of Ifield is ideally located to make a significant contribution to the housing needs for Horsham and Crawley. The site is located within a broad area of search identified as 'Land West of Crawley' under the Horsham Draft Local Plan Regulation 18 Consultation.

Subject to the detail and final decisions on strategic allocations within the draft Horsham Local Plan, this wider growth opportunity could continue to play an important role in meeting future development needs over multiple plan periods. The draft Crawley Local Plan and supporting evidence base sets out the long-term importance of working with neighbouring authorities and the role of sustainable urban extensions in meeting long term development needs and support infrastructure delivery. It is therefore important that the longer-term potential is not precluded by the policies within this Plan period.

### **Removal of Policy SD3: North Crawley Area Action Plan and inclusion of Policy GAT2**

Homes England notes and accepts the justification for the removal of policy SD3 and the previously proposed Area Action Plan and the inclusion of the new Policy GAT2 noting that the updated policy position applies the same protections of the previous safeguarding policy to the area identified in the Gatwick Airport Masterplan 2019 until the national policy position is further outlined and considered through a comprehensive Local Plan Review, as identified in paragraph 1.33.

However, Homes England is concerned that this leaves a number of inconsistencies and gaps within the spatial strategy that results in a number of issues potentially being unresolved or resulting in other policies within the Plan being ineffective - specifically the mechanism to deliver key infrastructure.

The main concerns relate to:

- **Conflict between the safeguarded alignment of the Western Link (ST4) and Gatwick Safeguarding** – there is now a direct conflict between the two safeguarded areas. While the continued safeguarding for both infrastructure schemes is supported and remains critical to the delivery of the spatial strategy and objectives of the Plan as a whole, it is not clear how any conflict will be addressed (previously the North Crawley AAP through Strategic Policy SD3 provided an appropriate mechanism).

- **The extent of safeguarding of the future expansion of Gatwick airport** – it is noted that the proposed safeguarding is based on the Gatwick Airport Masterplan Option for a new southern runway based on the submission to the Airports Commission. On the basis of the current challenges facing the aviation sector and commitment from Gatwick Airport Limited (GAL) to progress its northern runway in the short to medium term, it is not clear whether the basis for the safeguarding boundary is fully justified, especially where this relates to non-operational land and where there is a risk this could fetter the delivery of essential infrastructure (Crawley Western Link Road) required to deliver the wider objectives of the Draft Crawley Local Plan and much needed employment floorspace in sustainable locations which would complement the emerging proposals at West of Ifield (see Homes England's separate representation relating specifically to Rowley Farm).

In order to address potential Draft Crawley Local Plan soundness, it is considered that as a minimum, further supporting text is required in GAT2 and ST4 about how potential conflicts will be managed and assessed as part of any future development proposals. A more robust approach would be to undertake further work both in terms of land take required for both the Western Link Road and Gatwick expansion to understand exact requirements and opportunities to reconcile / co-ordinate land take.

### **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 any development outside of the built area should be carefully considered, the policy should also recognise the need for housing across the wider area and potential relationship to wider housing growth in line with the objectives of Policy H1, Para 12.23 and the potential allocation identified in the HDC Local Plan Regulation 18 as 'West of Crawley'.

Within this context, the policy should recognise the importance of connectivity and the opportunity to contain essential links to new sustainable urban extensions outside of the built-up area. Specifically, consistent with the current form and use of the area, Homes England maintains the position that the policy should acknowledge the potential for pedestrian and cycle links within the West of Ifield Rural Fringe that would allow sustainable links to future development areas.

Further clarity is also required on how the policy will be applied beyond the Crawley boundary. The supporting text (Policy 4.64) appears to direct how schemes outside of Crawley should be treated. Homes England considers that the Policy itself should address this issue and should provide a positively worded commitment to work with adjacent local authorities to assess the capacity for adjacent areas to accommodate

development, having regard to the relevant evidence base and wider objectives for that area.

Consequently, the following alternative amendments to Policy CL8 'West of Ifield Rural Fringe' are considered necessary to make the Policy sound:

*"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 any 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.*

*Beyond the Crawley boundary, the Council will work with neighbouring authorities to assess the capacity of the landscape to accommodate development having regard of relevant evidence and wider objectives for the area".*

These amendments are necessary to fulfil CBC's duty to ensure the plan is positively prepared and effective thus acknowledging and providing flexibility for any future allocation to the West of Ifield that may be brought forward through neighbouring Local Plans, ensuring maximum opportunity to link with existing neighbourhoods. Failure to acknowledge this would also make CL8 inconsistent with other policies with the Draft Crawley Local Plan, for example Policy G1 and CL3(2)(ii), 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.

### **Strategic Policy H1: Housing Provision**

Homes England continue to support CBC's commitment to working with neighbouring authorities in the North West Sussex housing market area to explore the potential for urban extensions to Crawley as this accords with paragraph 72 of the NPPF.

It is noted that, given the amended plan period from 2020-35 to 2021-37 the scale of unmet housing need within the updated Reg 19 plan has increased by nearly 800 homes (up to 6,680 from 5,925). This level of unmet need compared to identified supply has also increased from 111% (5,355 vs 5,925) in the first version of the Reg 19 (2020) to 126% (5,320 vs 6,680). As a result, only 44% of need is proposed to be met within Crawley's administrative boundaries within the Local Plan period. Homes England therefore agrees it remains essential that the policy continues to reference the need for continued assessment of potential urban extensions to Crawley to meet this scale of development.

### **Removed Strategic Policy H3g: Urban Extensions and new paragraph 12.23**

Whilst Homes England supported the intention of the now removed policy H3g as per our Previous Representation, we agree that CBC cannot set policy for a neighbouring district. As a result, Homes England welcomes its amended position as supporting text.

Homes England recognise the purpose of this text 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 within Policy H1 for CBC to work closely with its neighbouring authorities and consider the unmet needs of Crawley over the Plan period and potentially beyond.

Although recognising its reduced weight, greater clarity is sought regarding criterion ii. (which Homes England previously commented on as H3g iv) reproduced below:

- ii. *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.*

Following publication of the Draft Local Plan, *the Crawley Transport Study – Transport Study of Strategic Development Options and Sustainable Transport Measures (May 2021)* has been published. This presents the results of strategic highway modelling carried out by Stantec on behalf of the borough using the Crawley SATURN Transport Model (CTM).

Homes England consider the modelling to robustly account for growth to 2037 which is associated with both background traffic network growth in Crawley and West Sussex and forecasts associated with the Draft Crawley Local Plan. Additional housing and employment being promoted in Horsham District has also been assumed at two sites west of Crawley as follows:

- **West of Ifield** – 3,750 dwellings, 25,000 sqm GFA employment (split evenly between B1/B2/B8 land uses; and
- **West of Kilnwood Vale** – 1,546 dwellings, 25,000 sqm GFA employment (split evenly between B1/B2/B8 land uses.

To mitigate the impacts of all additional growth on the highway network, the Crawley Transport Study first considers the benefit in increasing investment in sustainable mitigation. The interventions identified align with the *Crawley Transport Strategy, New Directions for Crawley – Transport and access for the 21<sup>st</sup> century (March 2020)*, which has an emphasis on encouraging the use of public transport, cycling and walking in preference to increasing highway capacity. Similarly, car trip reductions have been applied to the West of Ifield and West of Kilnwood Vale developments to account for high-quality bus, walking and cycling infrastructure to be provided. Homes England welcomes this inclusion and is committed to the sustainable transport strategy for West of Ifield which will encourage further car trip reductions above those tested in the modelling.

In a scenario without the Western Link Road, the modelling confirms that the level of growth to 2037 **can be accommodated with physical mitigation required at just one location, the Ifield Roundabout/Ifield Avenue/A23 Crawley Avenue junction [emphasis added]**. A local widening scheme of this junction in this location has been

identified which would mitigate the impacts of forecast growth. It is noted that this mitigation is required regardless of whether the West of Ifield or West of Kilnwood Vale development comes forward.

Whilst the modelling confirms that the level of growth assumed can be accommodated without the need for the Western Link Road, the implications of providing a 30 mph link from the A264 to the A23 London Road with a single traffic lane and single bus lane in each direction has been tested. The results suggest that the main beneficiaries of the Western Link Road are the western minor roads, predominantly Faygate Lane and Rusper Road, but that it would not significantly relieve traffic flows in Crawley.

While the need for the full Crawley Western Link in this Plan is not required, the study concludes the following:

*"There is potential for more future development west of Crawley beyond the levels of development that have been assumed in Scenario 3 of this study. This would likely have greater impact on the network and hence the need for a CWLR to relieve these impacts may become more evident."*<sup>2</sup>

Homes England continues to consider that the scoping of the Western Link is a critical aspect of advancing further major strategic development to the West of Crawley beyond the Draft Crawley Local Plan period and therefore the justification for it to be safeguarded remains.

However, it is important to ensure that the supporting text is not overly prescriptive in respect of the determinant of the need for and nature of the link, or overlooks the ability to encourage a shift towards more sustainable modes or impact on housing delivery. The presumption within the supporting text about what form the Western Link may take, the potential trigger points and delivery requirements is not justified nor supported by the transport modelling published to date and therefore not sound.

It is suggested that the wording (updated from our Previous Representation to reflect the revised Draft Crawley Local Plan) 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:

*If development is proposed to the western side of Crawley, the scoping, design and delivery of the ~~comprehensive~~ Western Link Road should be informed by transport evidence and support wider objectives, including those that enable high quality sustainable transport opportunities for both existing and new communities. The appropriate phasing of any link, in part or full, will be informed through the transport assessment and ~~prior to the completion~~ agreed by the signatories of an agreed Section 106 agreement, including West Sussex County Council.*

The second criterion which requires amendment in paragraph 12.23 is criterion vii (previously commented on as ix under the now removed H3g) is reproduced below:

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<sup>2</sup> Para 9.5.5 of the Crawley Transport Study

*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 that sustainable urban extensions 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 neighbouring authorities whose policies are yet to be adopted.

Homes England is fully committed to ensure more homes are built in areas of greatest need and to improve affordability. However, the Crawley 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 neighbouring authorities, albeit clearly involving close collaboration and working with CBC where appropriate as confirmed in the Duty to Co-operate Topic Paper and the Duty to Co-operate Statement. 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. Any final requirements will need to be justified on the basis of the evidence around housing need as well as viability assessment as part of the relevant Plan led process.

It is therefore requested that point ix is amended so that it removes any specific targets.

### **Strategic Policy GI3: Biodiversity and Net Gain**

Homes England are pleased to see the updates made to this policy, further to our Previous Representation, and the insertion of reference to a 10% net gain for biodiversity and associated mechanisms for delivery by referencing the emerging Environment Bill. This provides greater flexibility for a variety of capture mechanisms to ensure enhanced, conserved and compensatory biodiversity gain (and the management thereof) is secured as part of planning applications.

Homes England also note that while Paragraph 14.32 refers to finalisation of the Defra 2.0 metric, this has been delayed and wording should be updated to reference that the Biodiversity Metric 3.0 (the successor to the beta test metric 2.0) has now been re-scheduled to Autumn 2021.

### **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 and supports the amended policy intention to recognise that 'where the development is to enhance Local Green Space

functions, for example, through improvements to access, recreation and wildlife' very special circumstances exist, and development will be considered appropriate.

The policy should be consistent with Paragraph 101, 144 and 145 but particularly paragraph 146 of the NPPF and therefore it is suggested that an amendment to policy wording is made that removes any subjective terminology.

*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 is to enhance Local Green Space functions, for example, through improvements to access, recreation and wildlife*

### **Policy IN2: The Location and Provision of New Infrastructure**

Homes England note that Policy IN2 has been amended to strengthen policy position for accepting education facilities when there is a demonstrable need with supporting text in paragraph 8.14.

Whilst the intention is supported, further evidence is required as to the extent of the additional need across the Draft Crawley Local Plan period and whether this needs to be provided as part of a single site or through a combination or new provision and extensions to existing schools within different education planning areas. The 6 – 8 FE is presented as a range for the Borough as a whole and while a number of evidence studies are referenced in the Infrastructure Delivery Plan, it is not clear how the need has been identified or may change over the Plan period. While it is appropriate for the Infrastructure Plan to be updated regularly, the updates to the Local Plan cannot and therefore specific reference to the required FE should be more nuanced allowing it to be updated and clarified through future iterations of the IDP and therefore it is suggested that the supporting text is updated to read:

*" The Infrastructure Plan identifies a need for ~~recognises that there is an estimated need for around 6-8~~ additional forms of entry at secondary school level in Crawley during the course of the Plan. ~~and a~~ A new secondary school is therefore likely to be needed in the area. Due to Crawley's tightly constrained land supply, discussions are ongoing with WSCC and neighbouring authorities to consider secondary school provision to meet Crawley's needs as part of new strategic development close to Crawley. However, the Policy also makes allowance for consideration of education provision on sites within the borough allocated for uses including housing, should it not be possible to be met on an alternative site, particularly those currently or previously in education use."*

### **Policy ST3: Improving Rail Stations**

In light of the identified potential for the possible westward 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 Crawley Draft Local Plan makes various references to the possible westward expansion of Crawley urban area into the Horsham district. 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 as it could be located through the southern edge of land safeguarded for a potential future runway at Gatwick Airport. The policy confirms that the Search Corridor with the CBC administrative areas will be safeguarded from development which would be incompatible with the future delivery of a full Western Link as a sustainable transport corridor.

Homes England's concerns about the safeguarding conflict with GAT2 is set out above. The clarification in 17.28 is helpful to make clear that ongoing work is looking to secure engagement from GAL on the detailed alignment of the route – and this remains an important outcome. It is crucial that the proposed piece of infrastructure (identified as a requirement to serve cumulative development) as identified in ST4 is recognised as an acceptable use within the GAT2 safeguarded area or clarity provided as to how any conflict will be resolved.

Paragraph 17.24 highlights that *"It is anticipated that detailed impacts of further development onto the Crawley road network would be modelled through the Horsham District Local Plan Review process"*.

As set out above (see section Removed Strategic Policy H3g: Urban Extensions and new paragraph 12.23), the Crawley Transport Study has now been published, which takes account of a significant amount of growth within the Horsham administrative area during the Draft Crawley Local Plan period. As explained, the safeguarding is considered justified but this is on the basis of the need for a road at a future point in time rather than to address impacts of development within this Plan period. A more nuanced approach is required so that any requirements for a Western Link in terms of form, function and timing should be informed by further detailed modelling and assessment either as part of a Local Plan review or in response to strategic development schemes that have not been assessed as part of the strategic modelling exercise.

Homes England therefore proposes that a clarified position regarding the safeguarding of this route will allow for more detailed modelling of cumulative growth at a future point in time to address the route, design and delivery options of the Western Link (aligned with paragraph 12.21 of the Draft Crawley Local Plan).

Homes England also consider that in order for the Draft Crawley Local Plan to be sound and to ensure that the Link Road is deliverable, 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 supporting text should ensure flexibility around the use of future land acquisition strategies – including the potential use of CPO.



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~~.*

*If a need for the full Crawley Western Link is identified as necessary during this Plan period, the design and route of the Western Link ~~Road~~ must be informed by detailed transport assessment and take account of:*

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

- o Residential and commercial properties close to the route;*
- o the flood plain;*
- o the rural landscape;*
- o local biodiversity;*
- o sports pitch provision and recreation facilities; and*
- o 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.*

*To assist with the delivery of the Crawley Western Link, the Council will work with its partners, landowners and other stakeholders to identify appropriate land acquisition and delivery strategies. This will include the use of Compulsory Purchase Powers if necessary.*

Changes are also requested to Para 17.25. Currently the text refers to any "new highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space would be wholly unacceptable". Highways are not necessarily motorised vehicles (e.g. Bridleway) and the current wording could prevent sustainable transport being delivered to development West of Ifield which conflicts with intentions of new Para 12.23.

#### **Strategic Policy EP4: Development and Noise and Draft Crawley Local Plan Noise Annex**

The updated (January 2021) Annex provides policy context and establishes locally specific guidance through which the approach of Draft Crawley Local Plan Policy EP4: Development and Noise should be applied.

It is noted that the increase in the area exposed to aviation noise in which noise sensitive development is considered unacceptable has moved from 66dB  $L_{Aeq,16hr}$  / 57dB  $L_{Aeq,8hr}$  in the currently adopted Local Plan to 60dB  $L_{Aeq,16hr}$  / 57dB  $L_{Aeq,8hr}$  at night in the Draft Crawley Local Plan.

The technical note sets out a range of evidence to justify this based on an assessment of amenity, quality of life, health and learning. Across the topics, the cited evidence presents a range of potentially harmful noise exposure which is dependent on a number of other factors. Despite the range of evidence provided, there is no conclusive assessment to justify the extent of the reduction and it appears to be based on a reasoned judgement.

This has resulted in a restriction within the Draft Crawley Local Plan to be applied to future development within Crawley, despite there existing a number of precedents where a range of land uses have been permitted in areas within the now restricted 60dB  $L_{Aeq,16hr}$  contour. The technical note rejects development within the 60dB  $L_{Aeq,16hr}$  contour citing limited planning decisions, on the basis that a number of these examples relate to the expansion of existing aerodrome facilities and on the basis that there is 'no absolute requirement to build in such high noise locations' (Para 6.6).

Homes England question whether this argument can be fully justified within the context of Crawley, where there are acute housing issues and a significant constraint on the ability to meet housing needs within the boundary. The issue is further compounded by the fact that restrictions relate to the safeguarding for a new southern runway, which as set out in our response to GAT2, does not currently form part of the short – medium expansion plans of the airport and potentially prevents development coming forward unnecessarily.

It is therefore considered that Policy EP4, the Noise Appendix and supporting technical note should be amended so as to allow a more flexible approach to permitting development is required within the 60dB  $L_{Aeq,16hr}$  (proposed) – 66dB  $L_{Aeq,16hr}$  contour (existing). It is not suggested that development should be unfettered in this area, but that a site-specific consideration should be given to proposed land uses, design and mitigation measures that could enable development to take place and that would provide flexibility in how development can be delivered to support wider objectives of the Plan.

The noise guidance should also be clearer on which forms of development are proposed to be restricted under Policy EP4. For example, EP4 refers to 'noise sensitive development' (which is defined in the Draft Crawley Local Plan) whilst there are alternative uses referred to in Noise Annex Table 1. Within the Noise Annex, sufficient justification is not provided to extend restrictions, within the proposed contour, to the "whole development" (paragraph 5.11) which instead focuses on residential dwellings and gardens only. This additional proposed restriction to the "whole development" should therefore be removed and should focus on residential and other noise sensitive development (as defined in the Draft Crawley Local Plan).

Homes England further notes that the current Local Plan states that the Significant Observed Adverse Effect Level (SOAEL) is 57dB to 66dB  $L_{Aeq,16hr}$  for air traffic (a 9 dB range in noise level). The draft plan suggests 54dB to 60dB  $L_{Aeq,16hr}$  for aviation

transport sources (a 6 dB range in noise level and the upper limit is 6 dB lower than the current plan). 57 dB  $L_{Aeq,16hr}$  is the current level within policy (Aviation Policy Framework) that is the approximate onset of significant community annoyance. Consultation in 2017 (Consultation Response on UK Airspace Policy: A framework for balanced decisions on the design and use of airspace) suggests that the onset level should be 54 dB  $L_{Aeq,16hr}$  (i.e. 3 dB lower). It is not justified to apply a 6 dB change in the upper limit when the onset of significance community annoyance has only reduced by 3 dB (accepting that this is only reduced in consultation, and not in policy). As a result, there is a strong case that 63 dB  $L_{Aeq,16hour}$  could be argued to be the SOAEL/Unacceptable Adverse Effect Level.

Notwithstanding the above, Homes England previously requested greater clarity regarding the noise contours which form the basis on policy EP4 and the Noise Annex. This is provided in Figure 1 of the noise annex and it is clarified that planning applications will be determined on the basis of those contours or subsequent updates to the Noise Annex. It is important that the night time contour (much like the day time provided in the Annex Figure 1) should be provided to allow for reasonable interpretation (and the spatial implications of what is proposed for all potential allocations) to be further understood.