

Crawley 2037

Draft Crawley Borough Local Plan 2021 – 2037

June 2021

Regulation 19 Consultation

Representation on behalf of the Wilky Group



GatwickGreen

WHERE THE FUTURE WORKS

Policy HA1
Heritage Assets
June 2021



Crawley

Local Plan

Ref No:

Office use only

Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council
by 5pm on 17 February 2021.

Representations can be made via this form and emailed to 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. 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:	Ms	Mr
First name:	Sally	Simon
Surname:	Fish	Fife
Organisation:	Wilky Group	Savills
Address line 1:	Fetcham Park	Wessex House

Address line 2:	Lower Road	Priors Walk
Town/city:	Leatherhead	Wimborne
Postcode:	KT22 9HD	BH21 1PB
Telephone:	01483 230320	01202 856912
Email:	Sally.fish@Wilky.co.uk	sfife@savills.com

PART B – Your representation

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

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

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

Paragraph: Policy: Other:

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

- | | | |
|---|---|-----------------------------|
| 5.1. Legally compliant? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| 5.2. Sound? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input checked="" type="checkbox"/> | No <input type="checkbox"/> |

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

Please see attached response

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.

N/A

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:

The Planning Inspectorate's procedure guide for Local Plan Examinations (Feb 2021) states at para 3.14 that where a representor supports a policy, the LPA has the discretion to include that representor as part of its team at the Hearings. On this basis, TWG could attend the Hearings, if requested by Crawley Borough Council.

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

Signature



Date

29/06/2021

**Draft Crawley Borough Local Plan 2021 - 2037
January 2021**

Regulation 19 Consultation

Representation on behalf of the Wilky Group

Policy HA1: Heritage Assets

June 2021



1.0 Introduction

- 1.1 This representation is submitted on behalf of The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. This representation relates to Policy HA1 Heritage Assets in the draft Crawley Borough Local Plan, 2021 (DCBLP).
- 1.2 TWG owns about 48 ha (119 acres) of land east of Gatwick Airport. The land has been promoted by TWG as a strategic employment opportunity known as Gatwick Green (the Site). The Site is proposed for allocation as a Strategic Employment Location (SEL) of 47 ha (116 acres) in the DCBLP under Strategic Policy EC4 as a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 This representation notes that Policy HA1 is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2019) and the Planning Practice Guidance (PPG). It also confirms that Gatwick Green can be masterplanned and designed so as to be in accordance with the key objectives contained in Policy HA1.

2.0 Policy HA1 – intent of policy and compliance

Intention of the policy

- 2.1 The purpose of Policy HA1 is to identify the list of designated and non-designated heritage assets, and set out the key considerations for any development that may affect them. The core guidance is that the key features or significance of heritage assets are conserved and enhanced as a result of development. Great weight is given to the conservation of designated heritage assets pursuant to the statutory requirements of the Listed Building Act 1990; harm to, or the loss of, their significance will require justification in accordance with the importance of the asset and the degree of loss or harm, in line with local and national policy.
- 2.2 Separate guidance is set out on the approach to addressing harm to non-designated heritage assets, taking account of the scale of harm and the assets significance, including any harm to an asset's setting. Further guidance is provided on the scope of, and matters to be addressed in Heritage Impacts Assessments required at the planning application stage.

National planning policy and guidance

- 2.4 Chapter 16 of the NPPF sets out how planning policy should provide a positive strategy for the conservation and enjoyment of the historic environment and how development affecting heritage assets should be assessed. In relation to designated assets, the policy guidance places much emphasis on determining if harm represents a total loss, is substantial or less than substantial, with guidance on how to decide on the impacts of development proposals. In relation to proposals that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset. The policy guidance is broadly reflected in the wording of Policy HA1.
- 2.5 The NPPF policy is supplemented by more detailed guidance in Planning Practice Guidance (PPG) on the heritage environment¹. The PPG sets out more detailed guidance on the historic environment, including the approach to plan-making and guidance on decision-making, including the meaning of significance of an asset.
- 2.6 It is considered that Policy HA1 provides appropriate and proportionate protection for heritage assets in the Borough, consistent with national planning policy and guidance. Policy HA1 has been designed to ensure that these matters are addressed in the planning process – in relation to Gatwick Green, this will include the preparation of the masterplan, and an outline planning application with a supporting Heritage Impact Assessment in accordance with the requirements in Strategic Policy EC4.

3.0 Implications for Gatwick Green

- 3.1 Based on the Council's recent review of its heritage assets², there are a number of Listed and Locally Listed Buildings near the boundaries of the Gatwick Green allocation, but no Conservation Areas would be affected. The overall mastepanning of the Site under Strategic Policy EC4 will need to have regard to these assets and any other heritage features that arise from more detailed work. There will therefore be a range of heritage considerations taken into account in the design and operation of the proposals for the Site. These will include respecting the setting of these Listed Buildings and Locally Listed Buildings and conserving, though appropriate means, any archaeology within the Site.
- 3.2 The Appendices to TWG's representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) form part of the Council's evidence base (Consultation appendix 4b: Wilky

¹ <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>

² Heritage Assets Review, Place Services, Crawley Borough Council, December 2020

Group appendices combined). The environmental considerations relating to heritage matters are addressed in the 2020 Appendices and subject to Addenda contained at Appendices 3 - 7 of TWG's representation on Strategic Policy EC4. These Addenda confirm that the original recommendations remain valid in the context of the proposed allocation of Gatwick Green under Strategic Policies EC1 and EC4 and any other changes in circumstances.

- 3.3 The Addendum to the Heritage Constraints Appraisal confirms that the Site can be developed whilst respecting the various heritage assets adjacent to the Site, and includes recommendations on appropriate avoidance and mitigation measures. These matters will be addressed at the planning application stage and set out in a Heritage Impact Assessment and a Design and Access Statement.

4.0 Conclusions

- 4.1 TWG acknowledges the need for the Gatwick Green proposals to address the heritage considerations relating to the Site and referenced in Policy HA1. All feasibility investigations to date indicate that the 24.1ha minimum requirement can be delivered in accordance with these requirements. The masterplan proposals for the Site required under Strategic Policy EC4 will have regard to these considerations in achieving a sustainable and well-designed scheme for the Site.
- 4.2 It is considered that Policy HA1 provides appropriate and proportionate requirements for addressing heritage and matters, consistent with national policy. Development at Gatwick Green as allocated in Strategic Policy EC4 will be designed in a way so as to avoid or mitigate any harmful impacts on the setting of the heritage assets in the area.