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Dear Elizabeth and Sallie,

Re: Crawley College, Town Centre Opportunity Site.

We are writing to you on behalf of our clients, the Chichester College Group, in response to the Regulation 19(2) draft Crawley Local Plan (January 2021) and further to our recent discussions regarding our emerging Crawley College Masterplan.

This letter of representation builds on comments made informally to you by the College Group, in response to Regulation 19(1) in February 2020.

With our continued partnership working with you and other partners under the One Public Estate Board and the Town Centre BID, we support the continued identification of the College site as a Town Centre Opportunity Site within the emerging Local Plan.

The College Group also appreciate the continued support and partnership working that has been undertaken to date to allow us to develop our aspirations for the site under the S106 requirement of our recent STEM building, which has recently been completed. We hope you will agree this will be an asset to the College campus.

As you are aware the Masterplan was presented to members of the Economic Working Group on the 10th February and has since undergone final iterations ahead of formal approval now received from Clem, as your Head of Economy and Planning.

As you will be aware Vail Williams as planning agents for the College, and HNW as architects have been developing the Masterplan with Kevin Dillon as Urban Designer and Jean McPherson as Development Management Lead. Therefore we believe that the Masterplan document is policy compliant with both your Adopted and emerging Local Plan.

However, we do have a few comments and observations in regard to specific emerging policies that we would like to make comment on including:

- TC3 Town Centre Key Opportunities Sites
- TC5 Town Centre First
- H2 Key Housing Sites
- H3c Housing Typologies: Town Centre Residential Sites

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However please note that as there are two buildings within the site, D Block and the Theatre off the Main Tower, which have been identified for potential Local Listing as part of the evidence base assessment to support the emerging Local Plan, we will be making separate representation on the Heritage Asset Review. However, we have also provided as part of this representation comment on emerging heritage policies as set out in Chapter 6 'heritage' of the draft Local Plan (January 2021).

In addition, we have included comment on policies affecting the College site Masterplan proposals in regard to development design, including those set out in Chapter 4 'character landscape and development form' and Chapter 5 'Design and Development Requirements' of the draft Local Plan (January 2021).

Our Masterplan document includes consideration of the climate emergency and need for a sustainability strategy as part of the site proposals to demonstrate how any proposals coming forward on the site will represent sustainable development, including through opportunities to align with Crawley's District Energy Network aspirations as well as addressing sustainable design and construction and sustainable movement, to contribute towards meeting the borough's climate change targets. We have therefore noted relevant sustainability policies set out within Chapter's 14-17 of the draft Local Plan (2021).

Our detailed comments are set out below.

Town Centre Policies:

Strategic Policy TC3: Development Sites within the Town Centre Boundary

We continue to support policy TC3 which identifies the College site, alongside County Buildings, as a Town Centre Key Opportunity Site within the Town Centre Boundary which can *"enhance town centre vitality and viability in a sustainable location through mixed-use development that meets the economic and housing needs of the borough"*.

The policy supports mixed use development on the College site for residential and main town centre uses whilst maintaining the College's function and viability as an Outstanding Further Education College as a priority for the Town.

As you are aware, the Masterplan exercise which has been undertaken over the past year, ensures that the site will retain its educational use as a priority within the Southern area of the site. This efficient and effective use of the Southern part of the site, has opened up the opportunity to re-develop the Northern part of the site for residential led-development. This reflects the current market conditions and high level viability as considered by our development team at Vail Williams. However, we have also indicated potential for some commercial development where the design may allow.

We acknowledge that the final design of any development will need to secure detailed planning permission but believe the Masterplan has identified the key parameters which will guide any future development on this site, in compliance with emerging policy TC3 and aligning with the Council's Town Centre regeneration aspirations. This will allow the regeneration and efficient use of this currently under-utilised site, which is a key purpose of the emerging policy TC3 and will enable the provision of high-quality residential development within this highly sustainable town centre location.

We note that the emerging policy TC3 states that for the Crawley College site *"any development must accord with an appropriate master plan agreed with the Local Planning Authority and covering the whole campus and will be required to demonstrate that it can be achieved in a manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility."*

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We agree that the principle of TC3 is to maintain the Southern end of the site for educational use and this aligns with the approved Masterplan. As you are aware, whilst the masterplan will cover. However, for the Northern end of the site, we intend to develop this for predominately residential led uses reflecting current market conditions.

We note that within the emerging policy text TC3 it states that development will be supported on these sites where it is for:

- a. Main Town Centre Uses, or
- b. mixed use development for residential development and main town centre uses and/or town centre neighbourhood facilities.

However, we would like further clarification that this aligns with the predominately residential and educational focus of the College Masterplan proposals, as agreed and developed with your Officers. This is because we believe that the dual use of the site will holistically allow for new residential units on the Northern part of the site to successfully co-exist alongside the continued educational function of the Southern part of the site, demonstrating that *“the development positively contributes to the vitality and viability of Crawley Town Centre.”*

Whilst, we recognise in paragraph 11.22 of the reasoned justification, that policy TC3 intends to *“support a flexible approach to support a range of appropriate development typologies on the Town Centre Key Opportunity Sites”* and that the *“Development at these sites has significant potential to accommodate a mix of uses and take a balanced approach in meeting the economic and housing needs of the borough”* we assume that the approved masterplan is therefore acceptable. If however, residential led development as approved does not meet this policy test then we would suggest we discuss alternative wording.

This is essential to understand, as the Northern part of our site may come forward separately, and therefore we seek assurances that a predominately residential focus would be consistent as it may not be on its own, able to demonstrate *“sustainable economic growth and job creation in the borough”* in line with policy TC3.

In addition we have the following comments to make on the approved masterplan and how it aligns with criteria i-v in the policy:

Criteria i: states that development should positively contribute to the vitality and viability of the town centre, we believe the increase in education provision on the south and the new residential led development achieves this successfully

Criteria v: where residential forms part of development the requirements of local plan policy H3C are satisfied (please see commentary below).

Housing Policies:

Emerging **Policy H2: Key Housing Sites** identifies the College site as a *developable* (years 6-10) site within the Town Centre for residential development to contribute to meeting the 1,500 net dwellings within the town centre.

We would like to understand further as the One Public Estate process evolves, how the 1,500 dwellings are anticipated to be allocated across the Town Centre especially that the approved Masterplan confirms c363 maximum units, based on the Masterplanning assessment process in partnership with CBC that has highlighted that higher densities of residential development are possible within the Northern area of site.

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Strategic Policy H3c: Town Centre Sites

Emerging Policy H3c would be key to any redevelopment on the College site especially given that we anticipate that there will be a significant level of residential development on the Northern end of the site.

Whilst we do not expect to reduce employment numbers within the College, we do need to ensure that any redevelopment on the Southern part of the site is led by the College's operational needs as an educational facility.

As you will be aware our Masterplan demonstrates the required floorspace for the College to meet their needs currently and to accommodate the anticipated growth of the College into the future c 18,465 sqm. We have also provided indicative floor areas which we consider would be achievable on the Northern part of the site for residential development however, the exact figures will be determined as part of any future planning application. We would seek assurances that this level of development would be acceptable under the emerging policy wording.

We appreciate that criteria ii of Policy H3c seeks to ensure that any scheme would provide active frontages on the ground floor level in order to ensure movement and access through to the wider town centre are maintained and this is evident in the masterplan.

In addition, criteria iii of policy H3c seeks to ensure that any housing scheme would achieve the *"correct housing mix for the town centre, as set out in Policy H4, particularly preventing an over-supply of small dwellings, and should create a balance in tenure, including through encouraging owner-occupation, encouraging affordable tenures, and monitoring the ratio of private rented accommodation"*.

Whilst at this stage we are not in a position to confirm the number or mix of units proposed on the Northern part of the site, however we are aware that the SHMA assessment and H4 require a balance of unit sizes, and tenure and would seek to discuss this further with the Council as our Masterplan evolves.

We do however note emerging **Policy H4: Future Housing Mix states** that *"In delivering the affordable housing element of residential schemes, in line with Policy H5, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council's Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need. These should include smaller dwellings designed to meet the needs of families."* We would wish to discuss this as the masterplan develops further but would at this stage, expect that a higher density of smaller units would be more suitable in the context of the College site.

We also believe that our approved Masterplan ensures the development of the site will meet criteria iv of Policy H3c which states that *"The development will be designed to be integrated effectively with existing businesses and community facilities and to adequately address existing and potential noise and nuisance arising from the mix of town centre uses through suitable mitigation before the development is occupied;"* Details of this are set out in our Masterplan document especially in regard to the education campus to the south and will be addressed in more detail as the proposals progress to the formal planning application stage.

For criteria v. we note that there is a need to ensure that we work with the Council and WSCC to ensure that the *"Cumulative infrastructure needs of the increasing residential population in the town centre are clearly identified and met, and the proposal has been justified and is adequately supported by sufficient social facilities and infrastructure located within the town centre or accessible from the development;"* However, we would

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again hope that the OPE work can identify such issues for this gateway into the town at an early stage in the development process.

We also support criteria vi of H3c which states that *“Where a lower car parking provision is anticipated, alternative transport proposals must be justified, agreed and implemented;”* This is especially given our Town Centre location which provides a highly sustainable location for development and we would again wish to work with WSCC and CBC to discuss this opportunity further for both parts of the College site.

In regard to the parking standards, we are required currently to provide 1 space for 1 or 2 bed units. However the emerging standards reduce this to 0.6 space for 1 bed unit or 1.1 space for a 2 bed. Our masterplan provides for layout one c254 spaces for 363 dwellings or layout 2 provides 171 spaces for 358 units. The masterplan therefore meets the new emerging standard requirements and we support this alternation to the parking standards.

Finally, in regard to H3c, we acknowledge that criteria vii, looks to *“maximises the potential capacity of the site and use the land efficiently, through a careful and high quality design-led approach;”* and this aligns with our objectives for the site as set out within our Masterplan and our joint OPE work with CBC and WSCC.

Character Policies:

Chapter 4 ‘Character, Landscape and Development Form’

Emerging **Policy CL2: Making Successful Places - Principles of Good Urban Design** states that existing character and effective use of land as well as built form, layout and movement are essential for informing new development proposals. It states that all new development must identify test determine and where appropriate and brace opportunities for increased density. This is supported in para 4.27 of the reasoned justification for policy CL2 which requires an existing character assessment being undertaken which was undertaken as stage 1 of our Masterplan document.

We note that the policy requires illustrative tools to be utilised for major proposals to show the existing setting and context in particular from a street level perspective, such as through 3D views modelling and we support this approach for major schemes.

Stage 1 of our Masterplan provides a detailed assessment of the site and surrounding area to establish structuring principles to guide potential layouts and quantum of development that would be achievable on the site. We have therefore given detailed consideration to the emerging policies within Chapter 4 in regard to the layout and character of College site, as well as seeking opportunities to protect and enhance key views onto the site and provide improved connections between the residential neighbourhoods with the Memorial Gardens and wider Town Centre.

In emerging **Policy CL4: Compact Development – Layout, Scale and Appearance** major proposals will be required to achieve a minimum density of 200 dwellings per hectare where the site comprises brownfield land *within an 8 minute walking distance of Crawley rail and bus station, Town Centre Fastway stops at the Broadway and Leisure Park and Three Bridges rail station.*

However, our masterplan work has provided and undertaken detailed site analysis of the Northern Site and whilst higher densities on sites including our may be appropriate, site specifics may ensure that such high densities are not appropriate. We are currently showing between 199 and 201 DPH. This clearly demonstrates that, although at masterplan stage such site specifics must be considered. We therefore recommend wording

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is included to ensure that where all options are considered but such definitive DPH is required that the policy allows such flexibility,

We would seek clarity however that this policy could align with the lower proposed parking provision on these sites and where necessary accept that a lower amount of parking would be achievable where space is limited, where a site has a Town Centre or sustainable location.

We also note that in paragraph 4.47 of the reasoned justification for policy CL4 that it states *“In seeking to achieve higher densities, an over-provision of smaller studio and one bed units against the council’s housing needs would not be considered acceptable. Policy H4 sets the expected housing mix for schemes within the borough and proposals will be measured against this starting point.”*

We would therefore seek to work with the Council to understand the density of development anticipated for the College site, especially given its dual-use with the on-going College provision. We are confident that our Masterplan provides a good basis of design and structuring principles to support circa 200 DPD on the Northern part of the site. However, we would like to confirm how this policy requirement could impact on requirements in other policies including open space requirements, GI and key infrastructure provision for both parts of the site in order to support such high density development.

Aligning with emerging **Policy CL5: Development Briefs and Masterplanning** we consider that our Masterplan has succeeded in providing an *“indicative and flexible vision for future development form, urban design concepts and options”* and is *“informed by preliminary technical appraisals and viability testing”*. We also agree that a Masterplan should set out *“principles on matters of importance rather than prescribing design in detail.”*

Design & Development Requirements

Chapter 5 ‘Design and Development Requirements’

Policy DD1 relates to normal requirements of all new development. As part of our master planning work we have looked to ensure that the criteria identified from a to j have been considered in principal and note that there are new requirements for any major applications, in excess of 45 dwellings per hectare to look at indicative future management and maintenance plans for semi-public or semi-private areas of landscaping, whilst all development must consider street scene improvements public art etc and have regards to the council’s waste and recycling guidance document . No specific comments are therefore made in relation to policy DD1 but we welcomed the clarity in the new project in the new policy

Heritage Policies:

Chapter 6 ‘Heritage’

We note that as part of the supporting evidence base for the emerging Local Plan, a detailed assessment of the Borough’s heritage assets has been undertaken. As set out in emerging **Policy HA1: Heritage Assets** this included a review of heritage assets such as Listed Buildings as well as Conservation Areas, Areas of Special Local Character and Locally Listed Buildings.

We have reviewed the Council’s assessment, undertaken by an external consultant (Place Services) and have made a separate representation on this in particular in relation to the proposed Local Listed of two buildings within the College site as well as proposals to introduce a Town Centre Conservation Area, eastwards towards the College site. The two buildings within the College site include the Theatre building which is located on the top north-eastern corner adjacent to Northgate Avenue Roundabout and attached to the Tower block, and D-

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block which is a four storey building located within the main area of the site and fronting College Road. This study also identifies a 3 storey building that is not proposed to be locally listed.

We note that emerging policy HA1 encourages “*regeneration proposals that make sensitive use of heritage assets, particularly where these bring redundant or under used buildings or areas, especially any on Historic England’s At Risk Register, into appropriate use.*”

Given that both of these buildings are on the Northern part of the site which is predominantly vacant and under-utilised, we consider that our Masterplan proposals would provide opportunity to re-purpose these buildings and enhance the visual appearance and quality through carefully considered design, but do not consider it necessary to progress Locally List given that the site is identified for re-development for the purpose of regeneration as set out in Policy TC3. We therefore object to the evidence base supporting the heritage review and further detail is provided in related representation to that consultation.

However, should these buildings be Locally Listed despite the colleges evidence and objections, we note that any proposals coming forward on the site would need to have consideration for emerging **Policy HA5: Locally Listed Buildings** which states that “*Development proposals affecting a Locally Listed Building must demonstrate in the Heritage Impact Assessment*” taking into account its heritage significance.

In addition the policy states that where proposals seek to demolition or partially demolition a Locally Listed Building this may be acceptable “*in exceptional circumstances if the development proposals: a) reflect or retain the key features of the original building; and b) significantly outweigh the merit of retaining of the original building with regard to social, economic and environmental benefit to the wider area.*” We believe that our evidence on the state of the buildings and the wider social benefit of the masterplan as a comprehensive and efficient use of the town centre opportunity site will be undermine by these local listing, and therefore the policy evidence is at odds with TC3.

Environmental Sustainability Policies:

We note that the emerging Local Plan seeks to continue protecting and enhancing the Borough’s network of green infrastructure, public open spaces and biodiversity, and now also includes a minimum requirement for proposals to “*achieve a net gain for biodiversity in accordance with government expectations, currently a 10% increase in habitat value for wildlife compared with the pre-development baseline.*” Our Masterplan has considered opportunities for enhancing green links through the site as a key structuring principle and this has informed the proposed layout options for development, in accordance with the relevant emerging policies.

We also note the Local Plan commitment to supporting the transition towards national carbon reduction targets, with the aim of being carbon neutral by 2050. This is supported by **Policy SDC1: Sustainable Design and Construction** as well as the continued development of District Energy Networks (DEN) in line with **Policy SDC2**. We would seek to continue engaging further with the Council on this opportunity to ensure the College site is able to support DEN infrastructure and this has been a key consideration in the proposed layout options for our Masterplan.

We recognise the requirement for residential development to meet “*an advanced water efficiency standard of 100 litres/person/day*” in line **with Policy SDC3: Tackling Water Stress** due to the Borough being situated within a wider area of serious water stress.



In addition, we note the importance of protecting the Borough's natural environment and the health of its local communities. This has been addressed through emerging policies on flood risk, contamination, noise, air quality and light pollution. Our Masterplan proposals have considered these emerging policies early on, highlighting site specific constraints that has enabled a more efficient use of the land whilst minimising the risk of adverse impacts on the surrounding community and local environment.

Sustainable Transport Policies:

Policy ST1: Development and Requirements for Sustainable Transport supports development which is *"located and designed so as to encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel by private motor vehicle."* Aligning with the four criteria of this policy, we consider that our Masterplan proposals demonstrate a highly sustainable development in terms of location, connectivity and movement, and we would seek to engage further with CBC and WSCC as Highways Authority, to ensure that opportunities for sustainable travel continue to be supported as the proposals evolve.

In terms of Electric Vehicle (EV) charging infrastructure, we acknowledge the WSCC requirement for a 37% proportion of new car parking spaces to be EV active charging points in 2022 (as set out in Crawley's draft Local Plan Parking Standards Annex) and that this percentage figure is proposed to increase each year, rising to 41% in 2023, 45% in 2024 and so on. We agree with this requirement in principle and understand there is a need to provide this infrastructure in order to support the government's intention for 50% - 70% of all new car sales to be ultra-low emission by 2030. However, we will need to understand how this will be delivered through development and the significant electricity supply that would be required to support this infrastructure. Therefore, we would seek to engage with the Council in understanding opportunities for meeting energy supply needs for the College site and in connection with other Town Centre re-development sites.

We note also that criteria ii requires the proposals to provide an appropriate amount and type of parking in accordance with **Policy ST2: Car and Cycle Parking Standards**. As noted above, our proposals have demonstrated parking provision which meets with the requirements of the emerging standards contained within the Parking Standards Annex of the emerging Plan and in line with Policy ST2. In addition we have provided cycle parking provision for approx. 430 resident spaces and 46 visitor spaces, which aligns with the current Adopted and emerging standards for 1 space per one bed dwelling, 2 spaces per two bed dwelling and 1 space per 8 dwellings for visitors.

As our proposals progress to detail design we would seek to engage with WSCC as Highways Authority at pre-application stage in regard to our sustainable transport proposals and parking provisions.

Conclusions

We are grateful for the opportunity to comment on the Regulation 19(2) consultation and would seek further to engage directly with the Council in regard to the key matters regarding the Town Centre regeneration proposals and in particular policy requirements to support the successful redevelopment of Key Opportunity sites within the Town Centre in line with our approved Masterplan.

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Should have any further questions please do not hesitate to contact me.

Yours sincerely

A handwritten signature in black ink that reads 'S Holloway'.

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