

Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

Regulation 19 Consultation
Representation on behalf of
Gatwick Green Limited



GatwickGreen

WHERE THE FUTURE WORKS

Policy GAT2
Safeguarded Land
June 2023



Crawley Local Plan

<p>Ref No:</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 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:	Gatwick Green Limited	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.

Please see attached response

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:

Policy GAT2 safeguards land for an additional wide-spaced runway south of Gatwick Airport, including land east of the Airport required for airport-related surface car parking. GGL supports the Council's decision to exclude the Gatwick Green employment allocation under Strategic Policy EC4 from safeguarding on the basis that the airport has provided no robust evidence to support the use of this land for surface car parking. GGL does not put forward any evidence on the principle of safeguarding, but instead provides evidence to support the Council's case that there is no justification for safeguarding Gatwick Green for surface car parking, given the increasing use by airports, including Gatwick, of more land-efficient car parking models. GGL also puts forward significant evidence to demonstrate that Gatwick Green can be developed in a way that would be fully compatible with the airport's future plans for a southern wide-spaced runway.

GGL is also seeking important changes to the policy to provide for the highway access to Gatwick Green to be located within Safeguarded Land to ensure a resource and land-efficient approach to this infrastructure and align with the airport's planned realignment of Balcombe Road. The representation therefore presents significant technical evidence in support of the extent of safeguarding under Policy GAT2, which in turn support the Council's economic strategy, and the provision of highway infrastructure to serve Gatwick Green and aligned with the future wide-spaced runway highway proposals in a resource and land-efficient manner. These matters justify the attendance of GGL at the Hearings.

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

20/06/2023

**Draft Crawley Borough Local Plan 2023 - 204
January 2023**

Regulation 19 Consultation

Representation on behalf of Gatwick Green Limited

Policy GAT2: Safeguarded Land

June 2023



1.0 Introduction

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary 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. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. The representation relates to Policy GAT2 Safeguarded Land in the Draft Crawley Borough Local Plan, 2023 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The plan at **Appendix 1** shows the land owned by GGL and the extent of the proposed Gatwick Green allocation. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.

Scope of representation

- 1.3 This representation does not address the principle of Safeguarded Land for a possible additional wide-spaced runway at Gatwick Airport. Instead, it focuses on the extent of safeguarding under Policy GAT2 as identified on the draft Local Plan Map and its interface with Gatwick Green.
- 1.4 Land use planning and aviation evidence is provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport.
- 1.5 The representation also contains detailed evidence to support minor adjustments to the DCBLP to ensure that a land and resource-efficient approach is taken in the planning of shared highway access infrastructure.

Executive Summary

- 1.6 GGL supports Gatwick Green being removed from the extent of the Safeguarded Land, as identified under draft Policy GAT2, and provides evidence to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. The

representation includes airport planning evidence by Mott MacDonald to support the case being made.

- 1.7 The Aviation Policy Framework (APF¹) and the National Planning Policy Framework (NPPF, 2021) provide national aviation and planning policy to guide the future expansion of airport infrastructure. The APF states that airport master plans should be subject to wide consultation with local authorities, the community and stakeholders, allowing the future development of airports to be considered in the local plan process. Airport Master Plans should contain sufficient information and drawings to identify any additional land requirements, which under the NPPF must be based on ‘robust’ evidence to identify any infrastructure that is ‘critical’ to the scheme so as to minimise long-term uncertainty and blight.
- 1.8 Gatwick Airport Ltd (GAL) prepared the Gatwick Area Master Plan in 2019² (GAMP). The GAMP is a key document where the evidence and justification for safeguarding is expected to be found. The Council should therefore expect to see the robust evidence that supports the extent of the Safeguarded Land in the GAMP. However, whilst the GAMP includes a conceptual layout for an additional runway, this is not underpinned by any evidence to support the extent of land safeguarded for surface parking east of Balcombe Road (c 92 ha or 227 acres).
- 1.9 The evidence, therefore, supports the Council’s decision to remove some of the historically Safeguarded Land indicated as surface airport-related car parking related to a future additional wide-spaced runway to allow the allocation of Gatwick Green. The Council’s decision is based on the conclusion that surface parking does not represent an efficient use of this land, particularly in light of anticipated proposals by GAL to provide more land-efficient car parking and sustainable surface access.
- 1.10 Indeed, GAL is already planning more land-efficient parking solutions through its Development Consent Order (DCO) for the continuous use of the emergency runway. The continued sterilisation of Gatwick Green for future car parking would represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.
- 1.11 The evidence also demonstrates that the highway requirements related to Gatwick Green and the additional wide-spaced runway can be accommodated in the Safeguarded Land between the Gatwick Green allocation and the M23 spur road – this represents a resource-efficient solution with significant benefits for GGL and GAL. These matters have

¹ The Aviation Policy Framework, DfT, March 2013

² Gatwick Airport Master Plan 2019, Gatwick Airport Ltd, July 2019

been the subject of discussions between GGL’s transport consultant and Gatwick Airport Limited (GAL). Some minor adjustments to the DCBLP are proposed to allow for the joint use of this strip of Safeguarded Land.

- 1.12 The evidence shows that in all other respects, Gatwick Green can be developed to be mutually compatible with the future development of an additional wide-spaced runway.

2.0 Extent of Safeguarded Land

Introduction

- 2.1 GGL provides evidence to demonstrate that the removal of Safeguarded Land from Gatwick Green under draft Policy GAT2 and identified on the Local Plan Map is justified. Evidence is also provided to demonstrate that Gatwick Green can be developed in a manner that is fully compatible with, and not prejudicial to, the future development of an additional wide-spaced runway at Gatwick Airport. GGL also proposes some minor adjustments to the Safeguarded Land to reflect GAL’s requirements and GGL’s landownership, and to policy wording to ensure that Gatwick Green can be fully developed in a land and resource-efficient manner which offers mutual compatibility with an additional runway in terms of highway / access infrastructure. The representation includes airport planning evidence by Mott MacDonald to support the case being made.

Safeguarding under national policy

- 2.2 The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF recommends that airports continue to prepare Master Plans to address the future development and expansion of airports (paras 4.11-4.12). In preparing local plans, local authorities are required to have regard to policies and advice in the APF, along with other relevant planning policy and guidance (para 5.6). Airport Master Plans should, *inter alia*, include any long-term land requirements associated with future airport development (para B.5) and that this should be clearly identified on a safeguarding map (para 5.8) to minimise long-term uncertainty and non-statutory blight (para B.5). However, the responsibility for safeguarding land for future expansion rests with local planning authorities based on guidance in the National Planning Policy Framework (NPPF). Similar guidance is contained in the UK Government’s Aviation Green Paper, known as the draft Aviation Strategy (AS, 2018 – para 3.66), although this is not formal Government policy.

- 2.3 The National Planning Policy Framework (NPPF, 2021) provides for the protection of sites and routes for future transport. The policy is contained at para 106(c)), which states that planning policies should:

"(c) identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure to widen transport choice and realise opportunities for large scale development;" (Savills emphasis)

- 2.4 The Aviation Policy Framework (APF³) reiterates the above policy from the NPPF at paragraphs 5.8-5.9, and goes on to state that Airport Master Plans should provide a clear statement of intent to enable future development of an airport to be given due consideration in local planning processes. It also requires that there should be wide consultation with local communities, including with local authorities. Furthermore, Airport Master Plans should contain sufficient information and drawings so that they may be clearly understood by the lay person as well as professionals and that any additional land should be clearly identified to minimise long-term uncertainty and non-statutory blight.
- 2.5 Gatwick Airport Ltd (GAL) prepared a Master Plan in 2019⁴ (GAMP). The Council should expect to see the robust evidence that supports the extent of the Safeguarded Land shown in the GAMP.
- 2.6 National policy contains two tests for the inclusion of safeguarding in local plans (para 106 (c)), namely that the extent of the safeguarding must be based on robust evidence of its need and that it must relate to infrastructure that is critical to the development of the infrastructure, so as to widen transport choice and realise opportunities for large scale development. The above tests are particularly important for the future of Crawley given the historic conflict between providing for unmet employment needs and safeguarding land for airport infrastructure. The NPPF is clear that any inclusion of safeguarding policies in a Local Plan is, in the first instance, a matter for the local plan-making authority to consider and justify. In the context of the policy and guidance contained in the NPPF and the APF, the need for any land to be safeguarded must be tested through the plan-making process.
- 2.7 Any safeguarding must, therefore, be justified by robust evidence of need and the area should be no bigger than that which is critical to serve the purpose of the scheme, i.e. related to required operational airport infrastructure. GGL has long made the case that there is no justification for safeguarding all the land to the east of Balcombe Road as shown on Plan 21 of the GAMP (**Appendix 2**) for surface car parking as indicated on

³ The Aviation Policy Framework, DfT, March 2013

⁴ Gatwick Airport Master Plan 2019, Gatwick Airport Ltd, July 2019

Plan 20 of the GAMP (**Appendix 3**). Safeguarding of the Site owned by GGL and comprising the Gatwick Green allocation is not considered to be justified by any 'robust' evidence in the GAMP. The GAMP does not establish that the Gatwick Green land is 'critical' to serving the purpose of delivering an additional wide-spaced runway. The Council should expect to find the 'robust' evidence for the extent of safeguarding in the GAMP but, in relation to the significant provision for surface airport-related car parking, no such evidence is presented. The Council were therefore right to conclude that the case for safeguarding all the land east of Balcombe Road had not been made. No other evidence to explain and justify the extent of current safeguarding has been seen.

- 2.8 Land east of Balcombe Road has been blighted by safeguarding since about 2007 which has had the effect of preventing the Council from allocating a strategic employment site and meeting its identified needs within the Crawley area. Gatwick Green has been consistently promoted for employment use by GGL throughout this period with its potential acknowledged through the Area of Search (AoS) in the adopted CBLP 2015 (Policy EC1) and the Area Action Plan (AAP) in the DCBLP 2020 (proposed Policy SD3).

The extent of safeguarding for airport car parking – planning policy considerations

- 2.9 Having properly considered and applied the safeguarding policy tests set out above, the Council has responded positively to the long-standing need for strategic employment land by allocating Gatwick Green for strategic employment development under Strategic Policies EC1 and EC4. The DCBLP therefore includes an area of Safeguarded Land for a future additional wide-spaced runway at Gatwick Airport, but with 44 ha of previously Safeguarded Land excluded, to accommodate an industrial-led Strategic Employment Location known as Gatwick Green.
- 2.10 The Council sets out its approach to planning for Gatwick Airport in Topic Paper 2⁵ - in addition to addressing the future needs of the airport, it sets out the strategy to bring forward new employment land/floorspace through the allocation of Gatwick Green, cross-referencing its economic evidence contained in Topic Paper 5⁶. Taking account of the Inspector's advice at the Advisory Visit in April 2020, the Council considered the extent of safeguarding rather than the principle of it. In doing so, it took account of the long-standing constraint safeguarding has imposed on the Borough's land supply; the findings on the need for more employment land contained in the Economic Growth Assessment

⁵ Topic Paper 2: Gatwick Airport, Crawley Borough Council, May 2023

⁶ Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, May 2023

Supplementary Update for Crawley (EGA SU)⁷ and Topic Paper 5, and the need to accommodate a Strategic Employment Location (SEL) at Gatwick Green (Topic Paper 2, para 2.3.4 and Section 3.5). The DCBLP therefore retained safeguarding, based on an amended land take, enabling a SEL to be allocated whilst safeguarding from development the land that would be required to accommodate a possible southern runway and associated infrastructure (para 3.5.1).

- 2.11 Savills' assessment of the future need for Industrial and Logistics (I&L) land (Savills Market Demand Forecast report)⁸ provides a forecast of the future need for I&L land based on a market demand analysis. This builds on the Council's econometric forecasts, the limitations of which are noted in Savills Market Demand Forecast report. This assessment concludes that the future demand for I&L land is 69 ha to 2040, not the 22.9 ha in the EGA SU.
- 2.12 Topic Paper 2 went on to conclude that the land to be allocated for Gatwick Green was not needed for the runway or related highway connections, but only for a large area of surface car parking. In light of the evidence, the proposed extent of surface car parking east of Balcombe Road (c 92 ha or 227 acres) did not represent an efficient use of land given that there are more land-efficient approaches. These include decked and robotic parking, which the airport is already adopting and which are in line with the airport's Surface Access Strategy (para 3.5.1).
- 2.13 The evidence, therefore, supports the Council's decision to remove some of the historically Safeguarded Land (indicated as surface airport-related car parking related to a future additional wide-spaced runway), to allow the allocation of Gatwick Green. The Council's decision is based on the conclusion that surface parking does not represent an efficient use of this land given proposals by GAL for more land-efficient car parking and sustainable surface access.
- 2.14 GAL is already planning more land-efficient parking solutions. It is promulgating a Development Consent Order (DCO) for the continuous use of the emergency runway, which includes decked parking arrangements to free up land for other critical land uses to enable capacity to be increased from c 50 mppa (million passengers per annum) to c 80 mppa, an increase in capacity of 60%.
- 2.15 In addition to the long-standing unmet need for employment land, the Council is still aware of the need to address the residual effects of the COVID-19 pandemic, which

⁷ Northern West Sussex Economic Growth Assessment, Supplementary Update for Crawley, Final Report, Crawley Borough Council, January 2023

⁸ Appendix 2 to representation on Strategic Policy EC1 – Savills on behalf of GGL

exposed a lack of resilience in Crawley’s economy due to structural difficulties. At the end of 2021, CBC issued “One Town” Crawley’s Economic Recovery Plan⁹ which provides a vision for Crawley’s future socio-economic prosperity. The ‘one town’ vision centred on a green growth economy delivered through, *inter alia*, a new site to help boost jobs for residents; tackling long term structural economic challenges by attracting business investment and addressing the limited supply of employment land, and delivering a diverse and resilient economy. Crawley BC intended to employ ‘flagship interventions’ to achieve this, one of which would be unlocking sufficient suitable employment land to drive recovery.

2.16 The objectives of the plan are embodied in Strategic Policies EC1 and EC4 of the DCBLP, which allocates Gatwick Green. The allocation has been made in light of long-term economic circumstances, but has gained further momentum to address the structural difficulties exposed by the COVID-19 pandemic. The approach also recognises that retaining the Site for possible long term airport-related surface car parking would represent “*an inefficient use of the land*” in the context of:

- a. The Airport’s plans for decked and robotic parking to serve its short-term expansion plans under its planned Development Consent Order (DCO)¹⁰.
- b. The increasing switch to more sustainable modes of transport under its Surface Access Strategy (para 3.5.1, Topic Paper 2: Gatwick Airport, May 2023).

2.17 As previously stated, there is neither a critical need for, nor any robust evidence to support, the continued safeguarding of Gatwick Green for additional airport-related car parking.

2.18 On behalf of GGL, Mott MacDonald’s aviation team has undertaken a preliminary assessment of the need for airport-related surface long-stay car parking to serve the future additional wide-spaced runway at Gatwick Airport. The assessment considers whether there is a likely to be a need for 44 ha of airport-related surface car parking which would be lost to Gatwick Green, together with alternative approaches to accommodating future parking requirements – the assessment is contained in **Appendix 4**. The purpose of this work is to test the Council’s assessment that the land in question would represent “*an inefficient use of the land*” when set against the context of the Airport’s stated plans for decked parking, robotic parking, and higher yielding and more land-efficient valet parking products, along with the success already achieved in increasing use of more sustainable modes of transport.

⁹ “One Town” Crawley’s Economic Recovery Plan, Crawley Borough Council, December 2021

¹⁰ Your London Airport, Gatwick, our northern runway: making best use of Gatwick | Environmental Impact Assessment Scoping Report Volume 1: Main Text, GAL, September 2019 (paras 4.36 and 5.2.42)

- 2.19 The conclusion of the assessment is that it is very unlikely that there will be a need for the scale of surface car parking that would be displaced by Gatwick Green, and that any unmet need could be comfortably accommodated through alternative, more efficient parking solutions, both within the existing operational area and the remaining Safeguarded Land east of Balcombe Road, identified under Policy GAT2. As GAL is implementing and planning for alternative intensive parking solutions, as part of its DCO Northern Runway Project proposals, the full extent of land safeguarded for additional surface car parking will not be required in the future. The continued sterilisation of Gatwick Green for future car parking would, therefore, represent an unnecessary, inefficient and inappropriate use of a key strategic site needed to meet the clear and urgent economic needs of the Borough.
- 2.20 The policy in the NPPF requires **robust** evidence to justify safeguarding any land, and no such evidence has been provided in the GAMP with respect to the parking areas shown over Gatwick Green. GGL considers that the Council is correct in its decision that safeguarding Gatwick Green for surface car parking represents an inefficient use of land. In terms of the policy tests in the NPPF, namely the sustainability assessment of alternatives and the tests of soundness, the use of the Site as a Strategic Employment Location (SEL) as opposed to surface car parking is wholly justified. Surface car parking is, therefore, inefficient and the alternative use as a strategic employment site is justified not only through identified existing employment land needs, but also as a result of the ongoing structural difficulties with the Crawley economy post-pandemic.
- 2.21 The Council has assessed the alternative options in its Sustainability Appraisal¹¹ (SA/SEA). This evaluated three options: (1) safeguarding land as shown in the GAMP, (2) do not safeguard any land, and (3) safeguard land with an amended boundary to allow for strategic employment provision. Option 3 was selected as the most sustainable option as it responded to national policy to retain safeguarding, but with an amended boundary to accommodate Crawley’s unmet employment land needs in the form of a SEL at Gatwick Green. This approach enabled land south of the airport required to accommodate the physical land take of a possible wide-spaced runway and its operations to be retained. The approach is summarised in the DCBLP as the justification for allocating Gatwick Green under Policy GAT2 (para 10.21):

“...the council does not consider surface parking to represent an efficient use of land. The Airport is already accommodating parking more efficiently through decked and robotic parking, and its Surface Access Strategy seeks to reduce access to the airport by car. This area excluded from safeguarding is essential

¹¹ Crawley Borough Council Local Plan Review | Sustainability Appraisal / Strategic Environmental Assessment, Draft Report, For the Submission Local Plan, January 2021

to meet Crawley's employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location."

2.22 The analysis outlined above is reflected in Topic Paper 2 on Gatwick Airport.

The extent of safeguarding for airport car parking – airport masterplanning considerations

2.23 More detailed evidence in this representation demonstrates that the Council's analysis is correct, such that there is a robust case in support of Policy GAT2 as proposed. That evidence is contained in the assessment by Mott MacDonald (**Appendix 4**), which can be summarised as follows:

- The Aviation Policy Framework recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning processes.
- The National Planning Policy Framework (NPPF) states that there must be 'robust evidence' to identify and protect sites and routes 'critical' to developing transport infrastructure.
- An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport.
- The GAMP does not include analysis or justification for the extent of the area indicated for surface long-stay car parking between Balcombe Road and the M23, instead deferring to preceding Master Plans, that also do not include these details.
- Two trends have dominated car parking requirements at Gatwick Airport: (1) the significant improvement in public transport mode shift, from private cars to rail, and (2) additional car parking required to support growth in air traffic has been accommodated within existing airport owned land through intensification of parking density. GAL intends to continue both these trends to support anticipated growth over the next 15 years.
- There is no robust evidence available to justify the extent of surface parking that was initially indicated over 15 years ago. The Airport Masterplan of 2019 - the apparent justification for safeguarding - was not updated to take into account the well-established and continuing trends of a shift to sustainable public transport, parking density, valet parking and more recent innovative automated parking products that are more land-efficient.
- GAL's approach of safeguarding for surface parking in its Master Plan does not represent an efficient use of land given that there are more land-efficient alternatives including valet, block, decked and robotic parking. The Airport is already adopting some of these more efficient parking methods through its sustainable transport / surface access strategy, but there is no reference to these efficiencies in the plan shown for extensive surface parking for the wide-spaced runway.
- The evidence supports the Council's decision to remove part of this land proposed for safeguarding for extensive surface car parking and instead allocate it for an industrial-led development to meet critical unmet needs is fully justified.

- 2.24 Consistent with these findings and foreshadowing Policy GAT2 and the allocation of Gatwick Green, paragraph 3.20 of the DCBLP 2020 stated that *“the indicative plans for a southern runway provided in the Gatwick Airport Masterplan show a large area for surface car parking, indicating an inefficient use of valuable land in a constrained borough with high development needs. A more consolidated approach could potentially open up opportunities for other developments”*. In removing Gatwick Green from safeguarding, the Council recognised not only the historic and current evidenced need for employment land release, but also the urgent need to provide economic development opportunities
- 2.25 In light of the above economic considerations, GGL notes the Council’s approach to the principle of safeguarding and supports the general extent of Safeguarded Land under draft Policy GAT2 and as shown on the Draft Local Plan Map.

3.0 Compatibility between highway infrastructure associated with Gatwick Green and the additional wide-spaced runway

3.1 Between the Gatwick Green allocation and the M23 spur road is a strip of Safeguarded Land retained to accommodate highway infrastructure required for the possible additional wide-spaced runway at the Airport and owned by GGL (see plan at **Appendix 1**). This highway infrastructure comprises the following:

1. Two slip roads (that merge into one) intended to connect the diverted A23 to Junction 9 on the M23, following an alignment close to the existing M23 spur road.
2. The diversion of Balcombe Road to the east to follow the M23 and to re-join the diverted A23 to the south.

3.2 In addition to the above, GGL intends to create highway infrastructure for the Gatwick Green site, parallel and close to the M23 spur road. The adjoining Gatwick Green allocation requires access from Balcombe Road forming an east-west access road to serve storage and distribution development: this would result in the potential for three roads to be constructed in broadly the same corridor and running parallel to the M23 spur road. This could be reduced to two roads with a more efficient approach. GGL has given consideration as to how the highway infrastructure for Gatwick Green could be accommodated within the Safeguarded Land in a more efficient manner and without prejudicing the future provision of the slip roads to serve the proposed additional runway.

3.3 This arrangement would, therefore, ensure that the access strategy for Gatwick Green would respect the proposals for both the Gatwick DCO, based on plans shared by Gatwick Airport Limited (GAL) and the Gatwick Airport Master Plan (GAMP, 2019) and

the potential wide-spaced southern runway, based on the surface access strategy (2019) published by GAL. In summary:

- Land to the north of the site has been safeguarded by Crawley Borough Council in agreement with GGL to allow for proposed roads and embankments associated with both the DCO scheme and the Southern Runway Scheme. The latter identifies a diversion of Balcombe Road to a location adjacent to and west of the M23 motorway and along the southern side of the M23 Spur.
- The position of the northern access to GG does not prejudice the widening of the M23 spur over bridge proposed by GAL within the DCO.
- The alignment of the northern access to Gatwick Green through the Safeguarded Land represents a resource-efficient solution that would serve both the purposes of the Gatwick Green development and a possible future wide-spaced second runway.
- The northern diversion of Balcombe Road can be accommodated within the safeguarded land designated to the north of the Gatwick Green Site allocated in the Draft Crawley Borough Local Plan.
- Access through the existing (unused) Buckingham Gate to Gatwick Station and airport can be retained in both scenarios, (DCO and Southern Runway).
- The Southern Runway surface access does not prejudice the delivery of a southern access into Gatwick Green from Balcombe Road.
- The Gatwick Green development does not prejudice the delivery of the proposed grade separated junction as shown on the Southern Runway surface access plans and the network can be configured to retain access between the proposed car parks to the East and South of Gatwick Green. This can be achieved using existing adopted roads, notably, Balcombe Road, Fernhill Road and Antlands Lane. This is illustrated in the plan attached as **Appendix 5**.

3.4 The plan at **Appendix 5** shows how these proposed arrangements would work. The arrangements will ensure that (1) an access road through the Safeguarded Land would be fully compatible with the wide-spaced second runway highway proposals, and (2) the retained car parking areas to the east and south of Gatwick Green can be accessed from the existing adopted roads in the area. GGL

3.5 To avoid a land and resource-inefficient outcome, the Gatwick Green access road has been designed to coincide with a logical alignment of a diverted Balcombe Road within the Safeguarded Land. This could, in the future, form part of the diverted Balcombe Road and be upgraded and extended, as required by GAL. The M23 slip roads could also be accommodated within the identified Safeguarded Land.

3.6 The accommodation of these highway requirements has been discussed with GAL, with a view to reaching an agreement that these arrangements meet the needs of both parties. Periodic engagement with GAL has identified matters which may usefully be resolved prior to the Examination of the DCBLP.

- 3.7 In the absence of an agreement with GAL, GGL is clear that the proposed arrangements are technically feasible and viable from a transport planning and highways perspective. GGL considers that these arrangements represent pragmatic, workable and resource and land-efficient solutions which should be embodied into policy in the DCBLP. It allows GGL to utilise the land it owns in the most efficient manner, whilst not prejudicing the Airport's long term access plans. Further, it avoids the duplication of roads, thereby reducing the carbon footprint of the proposals, provides room for additional landscaping (as a buffer to the M23 spur) and would assist in reducing the cost of the future Airport highway infrastructure to the benefit of GAL.
- 3.8 These arrangements can be accommodated via a minor change to Policy GAT2 in the DCBLP, namely a policy response to facilitate the dual use of the Safeguarded Land in this area – details are set out later in this representation.
- 3.9 This change to the policy is being promoted by GGL and will require adjustments to Policy GAT2 in the DCBLP to allow for this logical, sustainable and resource-efficient solution.
- 3.10 The technical assessment by Mott MacDonald (**Appendix 4**) also addresses the wider compatibility between Gatwick Green and the proposed additional wide-spaced runway and related infrastructure. The assessments conclude that the Gatwick Green allocation is considered to be compatible with the future development of the airport for the following reasons:
- It would not block or prevent any critical infrastructure (such as runways, railways or terminal buildings) that are required to safeguard for an additional wide-spaced runway to the south of the existing airport.
 - It would not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements.
 - The site can be developed to be fully compliant with the land use requirements for PSZs¹², as described in the DfT's Circular 'Control of Development in Airport Public Safety Zones' published in March 2010.
 - Gatwick Green can be designed so as to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be taken into account and continue to be addressed as the scheme is developed through its design lifecycle.
 - Gatwick Green would be compatible with the Airport's short-term expansion plans for the use of the standby runway under GAL's proposed DCO application.

¹² Public Safety Zones relating to operational airport runways

Discussions between GGL and GAL

- 3.11 GGL and GAL held discussions relating to access to Gatwick Green and safeguarding for the delivery of a wide-spaced second runway to the south of Gatwick. The engagement took place over 2020-2021 and focused on the interface between the two projects, but GAL did not want to continue in relation to any detail. It was hoped that a Statement of Common Ground (SoCG) could be achieved, but no substantive agreement was reached between the parties. A brief statement setting out an agreed position is contained at **Appendix 6**. GGL will be re-engaging with GAL with the intention of achieving a SoCG prior to the DCBLP Examination.

4.0 Conclusions

- 4.1 It is concluded that against the tests of soundness at para 35 of the NPPF, Policy GAT2 is sound as it effectively reconciles the immediate need for critical economic development in Crawley Borough and the long term possibility of an additional wide-spaced runway at Gatwick Airport. This is a sound and positive approach to policy, which is justified by the Council's evidence contained in Topic Paper 2 (Gatwick Airport), Topic Paper 5 (Employment Needs and Land Supply) and the SA/SEA, and so is effective and consistent with national planning and aviation policy.
- 4.2 Whilst Policy GAT2 is sound, there is justification for a change to policy that will ensure that the efficient and effective use of land resources is achieved in relation to the provision of future highway connections. This minor change is referred to in this representation at paragraphs 3.1 to 3.9.
- 4.3 It is, therefore, considered that the following amendment should be made to the DCBLP to allow for Gatwick Green's highway infrastructure to be accommodated in the Safeguarded Land between Gatwick Green and the M23 spur road, in a land and resource-efficient manner and in a way that is fully compatible with the future highway infrastructure required to serve the possible additional wide-spaced runway:

Policy GAT2 (Safeguarded Land) should include a provision that states that any highway infrastructure associated with the Gatwick Green allocation under Strategic Policy EC4 can be accommodated in the Safeguarded Land between the Site and the M23 spur road, on the proviso that such infrastructure must not prejudice the future provision of motorway slip roads associated with the possible future additional wide-spaced runway.

- 4.4 In relation to the proposed change to the DCBLP above, a revision to Policy GAT2 has been made and is attached at **Appendix 7**.

Appendix 1

Site Plan



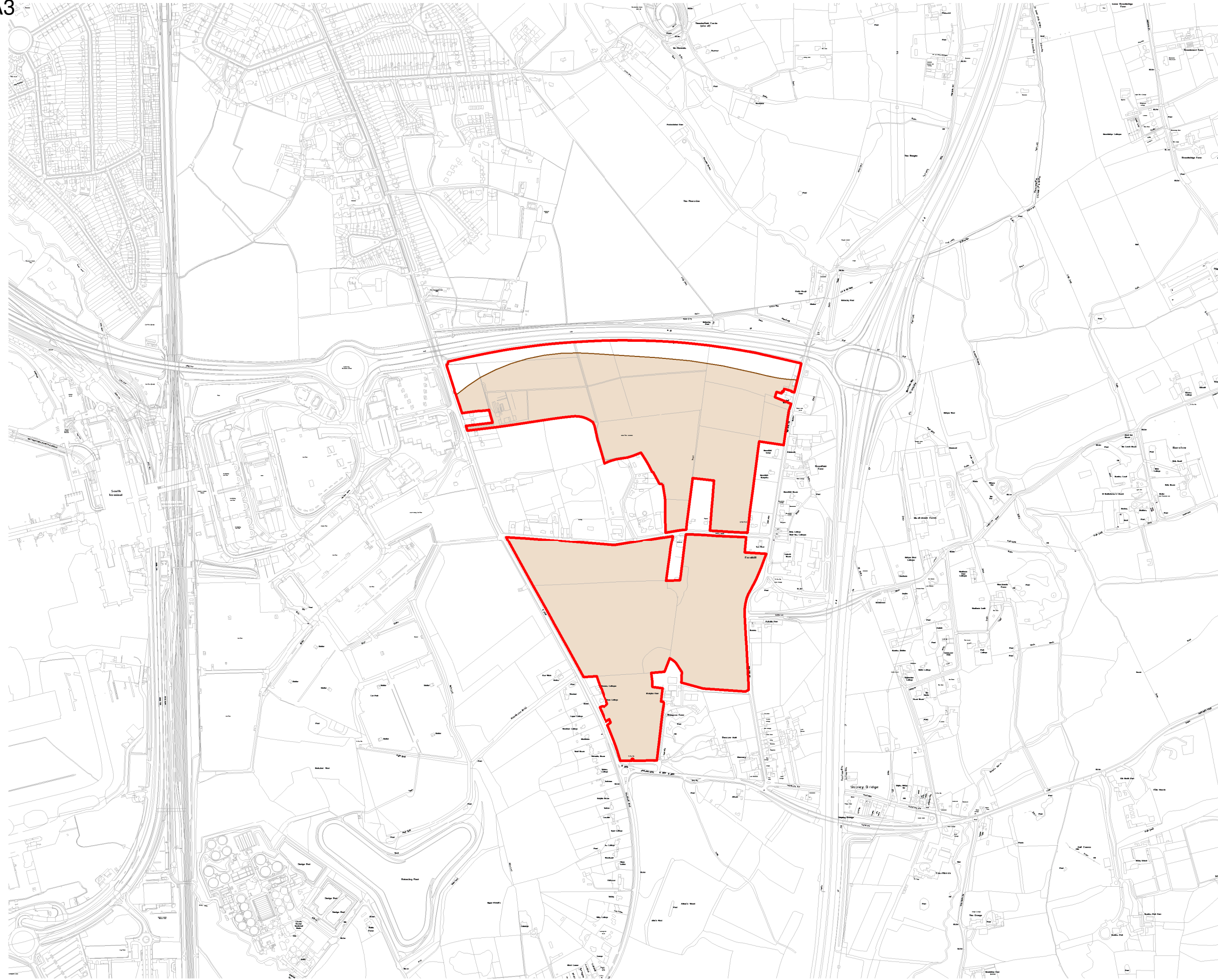
GatwickGreen

WHERE THE FUTURE WORKS

Client
Wilky Group

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Index	Revision	Date	Int	Chkd



LEGEND

- GATWICK GREEN LIMITED OWNED LAND
- PROPOSED STRATEGIC EMPLOYMENT LOCATION UNDER POLICIES EC1 AND EC4



APPROXIMATE NORTH

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Nero Brewery, Cricket Green, Hartley Wintney, Hants RG27 8QA
tel: 01252 844144 www.lsharchitects.co.uk

Job No / Drg No	Rev	Scale	Status
11/091 / SK-165	-	As indicated	PRELIMINARY
Date	Director	Author	Check
16/06/2023	JA	AH	--

Job
GATWICK GREEN

Drawing
Reg 19 (2023) - Appendix 1 - Site Plan

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes. Reproduced from Ordnance Survey mapping under Licence Numbers 10002432 & 100018493

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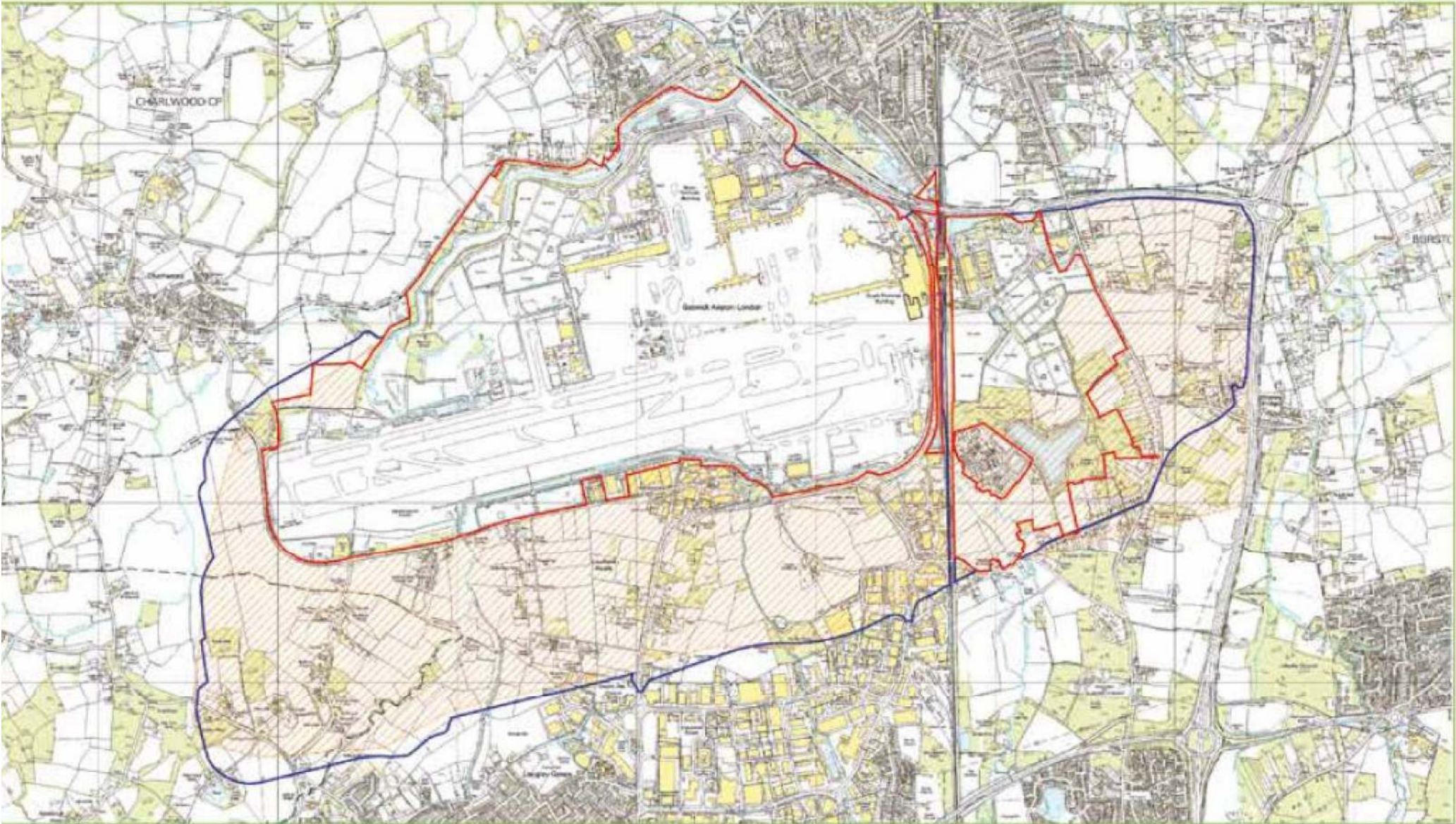
Appendix 2

Plan 21 from Gatwick Airport Master Plan, 2019



GatwickGreen

WHERE THE FUTURE WORKS



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PLAN 21 - Safeguarded land Additional Runway

 Existing Airport Boundary	 Proposed Additional Runway Airport Boundary	 Land Currently Safeguarded For The Additional Runway	 N
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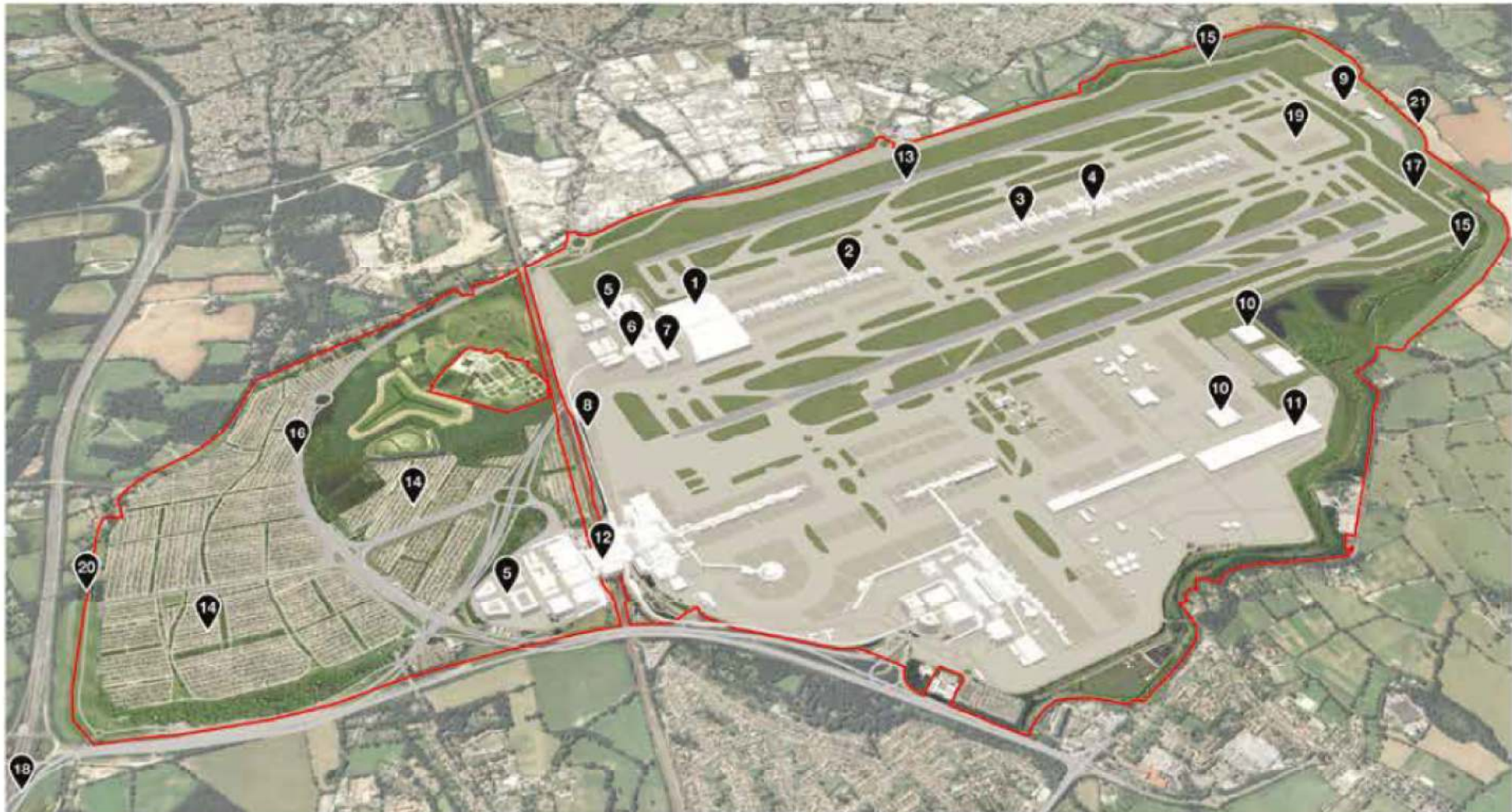
Appendix 3

Plan 20 from Gatwick Airport Master Plan, 2019



GatwickGreen

WHERE THE FUTURE WORKS



- | | | |
|-------------------------|--------------------------|----------------------------|
| 1 New Terminal Building | 10 New Hangar | 19 New Remote Stands |
| 2 Contact Pier | 11 New Cargo | 20 Gatcombe Road diversion |
| 3 Remote Pier | 12 Gatwick Gateway | 21 River Mole diversion |
| 4 New Control Tower | 13 New South Runway | |
| 5 Offices | 14 Long Stry Clock Poles | |
| 6 Carpark | 15 New Noise Barrier | |
| 7 Hotels | 16 AOD Diversion | |
| 8 People Mover System | 17 End Around Taxiway | |
| 9 Support Accomodations | 18 New M23 Sliproad | |
- Airport Boundary
 N

PLAN 20 - Airport Layout Additional Runway

Appendix 4

Gatwick Green: Safeguarding - Mott MacDonald



GatwickGreen

WHERE THE FUTURE WORKS

1 Introduction

1. Crawley Borough Council released the Draft Crawley Borough Local Plan (DCBLP / Plan) for Reg19 consultation from 9th May 2023 for six weeks. This follows a consultation from 6 January 2021 for responses by 30 June 2021 on an earlier draft of this Local Plan.
2. This statement forms an appendix to representations by Savills on behalf of Gatwick Green Limited (GGL) to Policy GAT2 (Safeguarded Land), which relates to (1) land designated in the Plan as safeguarded for the potential future development of an additional wide-spaced southern runway for Gatwick Airport, and (2) the deletion of land previously safeguarded to accommodate the allocation of Gatwick Green as a comprehensive industrial-led development of predominantly storage and distribution uses.
3. Gatwick Airport Limited (GAL) submitted an objection to this Strategic Employment Allocation at Gatwick Green (Policy EC4) in response to the 2021 consultation, with supporting Annexes drafted by RPS relating to the employment land allocation, and Arup relating to land safeguarding (Policy GAT2) and transport modelling.
4. In this statement, Section 2 provides an Executive Summary. Section 3 addresses the importance of Airport Master Plans and what they should contain, given they are required for land-use planning purposes. Section 4 assess the need for, and alternatives to, the land safeguarded for airport car parking related to a potential future wide-spaced southern runway. This section also includes a review of the Reg 19 submission by Gatwick Airport in response to the 2021 consultation on the draft local plan. Section 5 summarises these points. Section 6 provides overall conclusions.
5. This appendix has been prepared by Mott MacDonald's airport planning team, supported by transport planners who specialise in airport surface access within an Integrated Transport Division. Both the airport and transport planning teams are very experienced in providing airport masterplans and surface access strategies to airports of all sizes. They operate in a global market and have a track record of working for some of the busiest and most complex international hub airports. This includes providing both airport and transport planning services to Singapore Changi Airport, New York JFK Airport and London Heathrow Airport on major airport masterplans and new terminal development projects within the last 5 years.

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2 Executive Summary

6. Crawley Borough Council has published the DCBLP with an area of Safeguarded Land under Policy GAT2 for a future additional wide-spaced runway at Gatwick Airport. The Plan also allocates 44 ha of previously Safeguarded Land to accommodate an industrial-led Strategic Employment Location (SEL) known as Gatwick Green to meet the long-standing unmet economic needs of the Borough.
7. The Council set out its approach to planning for Gatwick Airport in a Topic Paper (Topic Paper 2: Gatwick Airport, January 2021). This sets out the in-principle case for safeguarding land for a future additional wide-spaced runway but excludes the land to be allocated for Gatwick Green. This is on the grounds it is not needed for critical airport infrastructure and that no robust evidence has been presented to justify its use for a large area of surface car parking.
8. The Aviation Policy Framework (APF, 2013) is Government policy that introduced the need for airports, as critical transport infrastructure, to provide Master Plans. These are to be based on an analysis of options and under GAL's Economic Regulation License are subject to consultation with the local community. The guidance supports the provision of a plan to show land safeguarded for these needs, which the National Planning Policy Framework (NPPF) requires is based on 'robust' evidence of the infrastructure that is 'critical' to the delivery of the expansion scheme. Master Plans form a key part of the evidence for local authorities to prepare local plans, including the designation of safeguarded land in line with national planning policy in the NPPF.
9. Airport Master Plans are required to provide robust forecasts of passenger numbers and air transport movements and translate these into infrastructure requirements and the land needed to accommodate those. The Gatwick Airport Master Plan 2019 (GAMP) contains three plans that relate to the proposed additional wide-spaced runway (Plans 20, 21 and 22). However, in respect of the extent of long-stay car parking, these plans are not supported by the robust analysis and options development work that is required by the NPPF. The annex to the GAL objection to the 2021 draft local plan referenced the submissions to the Airport's Commission in 2014 as the source for land safeguarding for car parking. However, this source also does not contain 'robust evidence' and simply states a requirement without justification. The Council's Topic Paper is therefore supported in relation to its findings on airport related surface car parking.
10. UK airports are all seeking to achieve an increasing rate of modal shift in passenger surface access from private vehicles to more sustainable modes of transport. These trends can be seen in increasingly ambitious mode-share targets that will continue in the context of the climate crisis. At Gatwick Airport, the share of passengers traveling to the airport by non-car modes of transport is forecast to increase from 44% in 2018, to 48% by 2022. This trend has and will continue to reduce the proportion of passengers that will require long-stay car parking. Consequently, the increase in passenger numbers over time will have a proportionally smaller effect on the need for long-stay airport car parking.
11. There are various considerations for, and approaches to, the provision of airport-related car parking associated with an additional wide-spaced runway at Gatwick. The GAMP describes a short- to medium-term future (5 to 15 years) in which, consistent with these trends and other considerations, there is proportionally less land identified for airport-related long-stay car parking. This is being achieved through

greater modal shift to public transport and denser (more land-efficient) car parking products that are common at UK airports.

12. In contrast, the approach to safeguarding for the long-term future additional wide-spaced runway in the GAMP inconsistently reverts to largely conventional surface car parking, that does not acknowledge the trends in modal shift and recent parking intensification projects that have already been, or are planned to be, undertaken. The approach of safeguarding this land for surface parking does not therefore represent an efficient use of land given that there are more compact alternatives though decked and robotic parking, which the airport is already adopting, and are in line with the Airport's Surface Access Strategy.
13. The GAMP (and earlier submissions to the Airports Commission) contain no robust evidence to justify the extent of land safeguarded for surface car parking, in terms of either demand or design solutions. Given this lack of evidence, the increasing use of alternative modes of surface access and the emerging alternatives to traditional surface car parking, the land occupied by Gatwick Green is not considered to be critical to the delivery of an additional wide-spaced southern runway. No additional evidence to justify the current extent of safeguarding has been seen.
14. The GAMP is GAL's public position on airport expansion and safeguarding for future expansion, required under Government policy. It is therefore reasonable for any public authority to expect the GAMP to justify future land use requirements and policy. In this regard, the GAMP falls short of fulfilling these requirements and accordingly the Council has allocated some of the surface parking area for critical economic infrastructure.
15. In relation to Aerodrome Safeguarding, Gatwick Green is fully compatible with the requirements to protect flight safety from inappropriate developments and protecting third party risk in accordance with DfT Public Safety Zones.
16. In the context of the Airport's proposed Development Consent Order (DCO) application for short-medium term expansion using the emergency ('Northern') runway to grow the airport capacity to 70 million passengers per annum (MPPA) by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report), Gatwick Green is fully compatible with these plans and no concerns have been raised by GAL in its discussions with GGL. This compatibility also applies in the event the airport expands to 80 MPPA as envisaged in GAL's DCO summer 2022 consultation document (para 1.1.8).
17. Safeguarding considerations associated with highway access to an expanded Gatwick Airport, including additional slip roads from the M23, the diversion of the A23 and access to retained safeguarded long-stay parking areas are addressed in the representation by Savills on behalf of GGL on Policy GAT2 and in Appendix 5 to that representation.
18. Overall, this appendix demonstrates that the development of Gatwick Green would be fully compatible with safeguarding for the development of an additional wide-spaced southern runway (and associated critical infrastructure) and would not hinder the sustainable growth of Gatwick Airport.

3 Airport Master Plans: purpose and scope

19. The Aviation Policy Framework (APF, 2013) provides current Government policy on aviation. The APF notes that the Government recommends that airports continue to prepare Master Plans as a clear statement of intent regarding the future development of an airport so that this can be given due consideration in local planning purposes. Guidance on Airport Master Plans is now contained in the APF, which recommends that the more ground covered and more extensive the consultation, the greater its value in informing future land use, transport and economic planning processes. Airport Master Plans are therefore the key document that should justify the extent of safeguarded land for future expansion.
20. The APF states that whilst Master Plans are not expected to contain detailed engineering drawings, they should “...contain sufficient information, including drawings where appropriate, so that they may be clearly understood by the lay person as well as professionals.” The APF goes on to state that where long-term land requirements for future development need to be identified, the “...additional land and property involved, including those associated with PSZs and safety surfaces, should be clearly identified to minimise long-term uncertainty and non-statutory blight”. It is therefore clear that Airport Master Plans are expected to be prepared as the basis for longer term land-use planning (para B.1), and that any safeguarded land should minimise long term blight (para B.5).
21. Past and current aviation policy envisages several pre-requisites for Airport Master Plans: (1) to be based on detailed analysis and planning work, (2) to contain sufficient information, and (3) that such land should minimise long-term uncertainty and blight.
22. National planning policy contained in the National Planning Policy Framework (NPPF) adds further important advice on the scope and depth of evidence needed to justify the safeguarding of land for airport expansion. Airport Masterplans are a key evidence source for addressing the requirements of national planning policy. The NPPF states that planning policies should “*identify and protect, **where there is robust evidence**, sites and routes which could be **critical** in developing infrastructure to widen transport choice and realise opportunities for large scale development; ...*” (para 104(c)). This advice is replicated in the APF (para 5.8).
23. It is therefore important to consider the Gatwick Airport Master Plan and examine whether it contains the robust evidence necessary, including analysis into future demand needs, options development, evaluation and selection to justify the extent of land required to accommodate infrastructure that is critical to the expansion proposals. Safeguarding is not justified unless such robust evidence and clear justification is demonstrated.
24. Similarly, the Annex to GAL’s objection to the 2021 draft local plan is also reviewed in the following section to determine whether it, in turn, includes ‘robust evidence’ to justify the extent of safeguarded land.
25. It should be noted that the GAL representations include the statement that all of the safeguarded land should be treated as a single entity. This disregards the important point of ‘criticality’. The land safeguarded for the second wide-space runway is location dependent, as the separation from the

existing runway is necessary to comply with aeronautical regulations for independent parallel runway operations and the expanded facilities must connect to and integrate with existing airfield infrastructure.

26. The same principle does not apply to long-stay car-parking, which is not location 'critical'. It is therefore an over-simplification to treat the safeguarded land a single entity, recognising that it includes different land-uses with varying levels of importance to airport expansion.

4 Airport – Safeguarded Land

4.1 Policy Context – GAT2: Safeguarded Land

27. The DCBLP includes a chapter relating to Gatwick Airport, including Policy GAT 2, addressing land safeguarding for a second wide-spaced runway as shown in Figure 4-1 below.

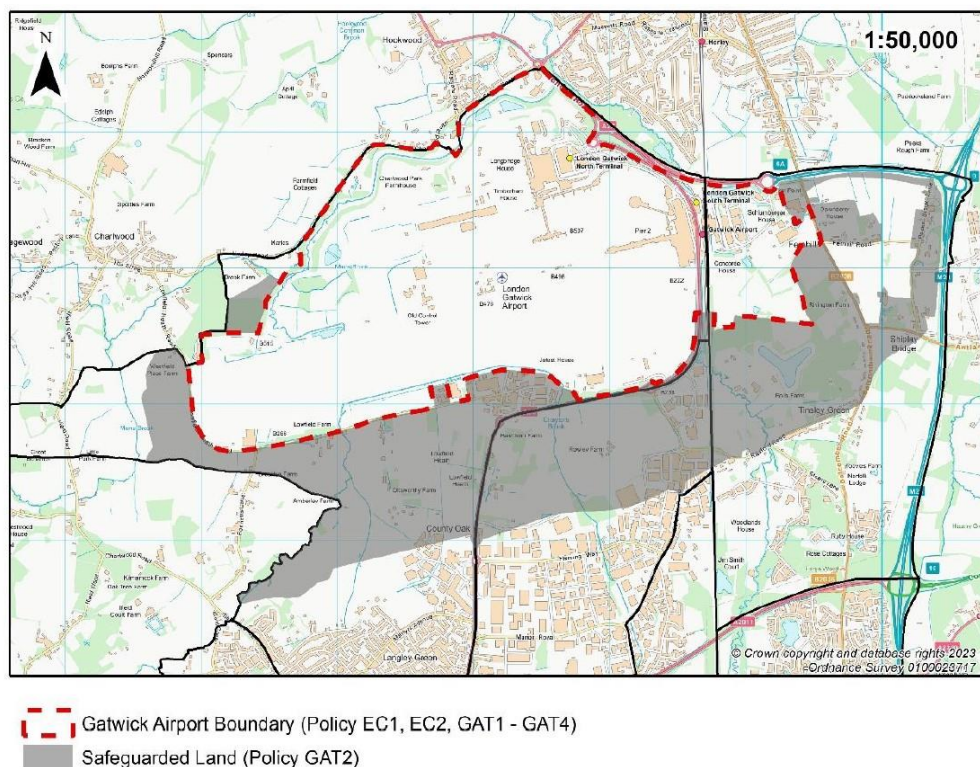


Figure 4-1. Extract from DCBLP showing proposed safeguarding area

28. This is supported by Topic Paper 2 relating to Gatwick Airport, which provides further context regarding aviation safeguarding policy, referencing the national Aviation Policy Framework (APF, 2013) and the National Planning Policy Framework (NPPF, 2019).

29. The DCBLP excludes the Gatwick Green employment site from the safeguarded area, which is shown in Figure 4-1 and justified in the supporting text to Policy GAT2 and in Topic Paper 2. The approach is justified by the need to meet Crawley’s economic needs and that surface airport car parking does not represent an efficient use of the land given the availability of more land-efficient parking options, such as decked and robotic parking (para 3.4.1, Topic Paper 2).

30. The policy framework for safeguarding land outside airports that may be required for future airport development is noted in the main representation on Policy GAT2 by Savills. This appendix focuses on assessing compliance with the NPPF based on the evidence in the GAMP, which is the key document where safeguarding needs would be expected to be set out and justified.

31. As GAL's representation to the 2021 DCBLP includes a reference back to the 2014 submission to the Airports Commission, this earlier document has also been reviewed to determine whether it provides robust evidence, on which the more recent GAMP is based.
32. The NPPF (2019) notes that the means of protecting land for future airport expansion is via Local Plans. As noted at paragraph 19, it is required that in planning for such protection, land identified for future development should be based on '**robust evidence**' to justify sites and routes that are '**critical**' to that infrastructure.
33. In summary, the basis for safeguarding land is Local Plans and safeguarding is not justified unless this NPPF test for 'robust' evidence and clear justification as to the 'critical' need for infrastructure and extent of land is demonstrated.

4.2 Gatwick Green Development

34. The Gatwick Green development proposes to provide a comprehensive industrial-led development of predominantly storage and distribution uses in an area of land to the east of Balcombe Road (Figure 4-2). The DCBLP states that, *"This area excluded from safeguarding is essential to meet Crawley's employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location"*. This is on the grounds that *"Given the constrained land supply within the borough and its significant employment and housing needs the council does not consider surface parking to represent an efficient use of land."*

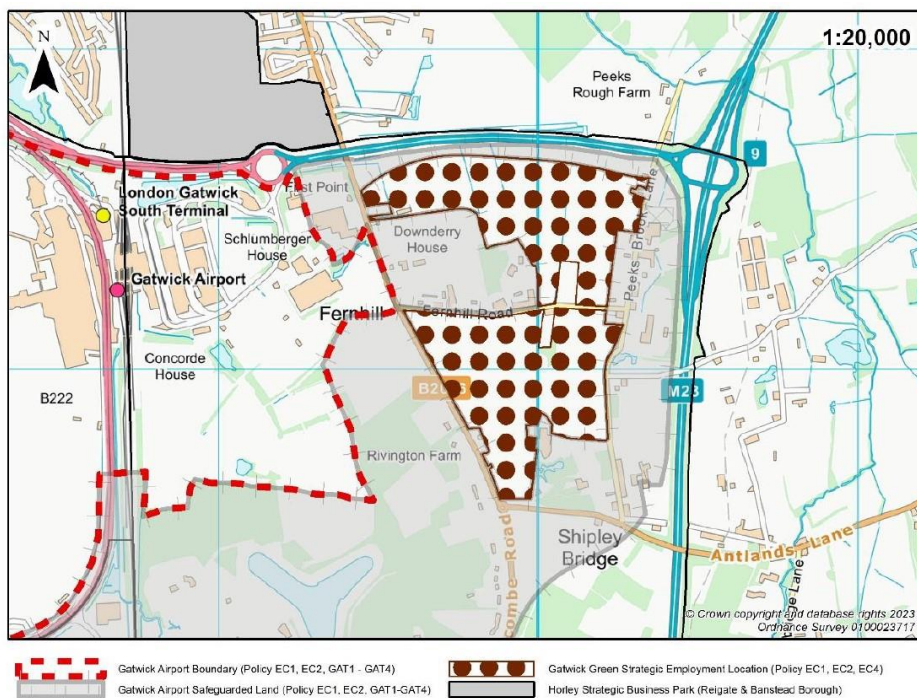


Figure 4-2. Extract from Draft Local Plan showing Strategic Employment Location

4.3 Gatwick Airport Master Plan(s)

4.3.1 Current Gatwick Airport Master Plan (2019)

35. Gatwick Airport Limited (GAL) published its most recent Gatwick Airport Master Plan in 2019 (GAMP). This document describes three possible future scenarios for the growth and development of the airport. Scenario 1 assumes the continuation of the existing single runway operation and indicates growth up to 61 million passengers per annum (MPPA) by 2032. Scenario 2 assumes the existing emergency ('Northern') runway, put into dependent use (for which a DCO application is underway), could add between 10 and 15 aircraft movements in peak hours, increasing capacity to 70 MPPA by 2032 (GAMP) and up to 74 MPPA by 2038 (EIA Scoping Report). Scenario 3 considers that a new wide-spaced southern runway could be delivered within approximately 10 years of starting the planning process and could take capacity up to 95 MPPA.
36. The GAMP includes clause 5.4.12 regarding southern runway safeguarding that states, "The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA. This currently safeguarded area is illustrated in Plan 21." **Figure 4-3** reproduces the GAMP Safeguarded Land. **Figure 4-4** reproduces the conceptual Airport Layout within the Safeguarded Land. It seems apparent that Figure 4-4 illustratively indicates extensive areas of surface parking to the East of the railway and the new access route to the new terminal.

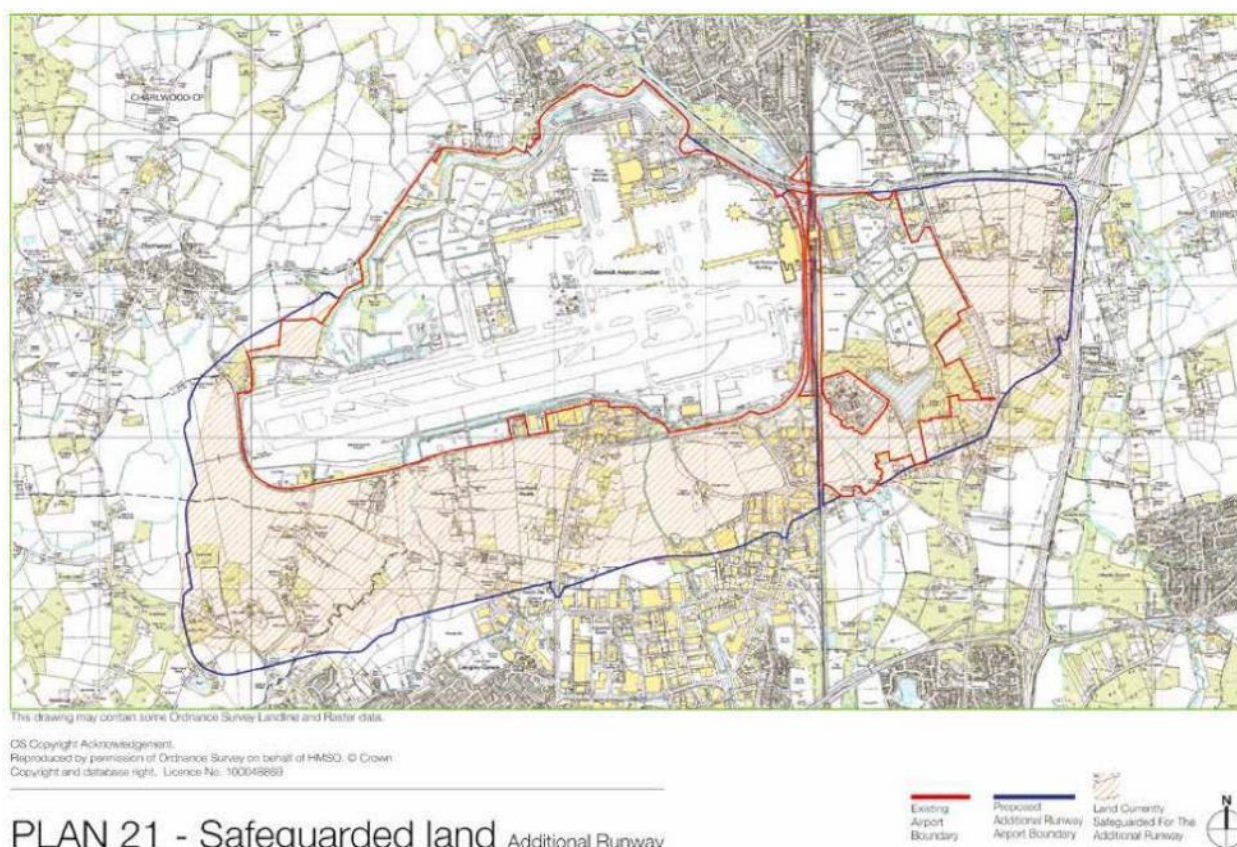


Figure 4-3. Safeguarded Land Extract from Gatwick Airport Master Plan 2019



Figure 4-4. Airport Layout Extract from Gatwick Airport Master Plan 2019

37. The landside transport section of the GAMP (published in 2019) summarises and is based on the preceding Airport Surface Access Strategy (ASAS), published in 2018. The ASAS includes information relating to car-parking provisions and public transport mode share (see section 4.5 below), which includes their ever increasing sustainable transport targets. However, the ASAS does not indicate how these might affect the amount of land that may be needed in the future to accommodate car parking related to the decreasing proportion of passengers that will travel to the airport by private car.
38. GAL has initiated a DCO process related to plans to put the Emergency ('Northern') Runway into continuous operational use. The government site for National Infrastructure Planning indicates that EIA scoping reports were submitted in September 2019. The scoping report indicates that GAL is pursuing Scenario 2 (emergency runway use), and not actively pursuing Scenario 3 (additional wide-spaced runway) but, nevertheless, GAL considers it in the national interest for land to continue to be safeguarded.
39. A Preliminary Environmental Information Report (PEIR) relating to this DCO was submitted in September 2021. This revised the forecast traffic increase to 75.6 MPPA by 2038 and to 80.2 MPPA by 2047, as a basis for economic benefits projections.

4.3.2 History of Master Plans for Gatwick Airport

40. In justification for the extent of land safeguarded for a future additional wide-spaced runway, the GAMP refers back to earlier Master Plans in clause 5.4.12, *“The area of land currently safeguard for the additional runway was based on a much earlier scheme developed by the previous airport owners, BAA.*
41. GAL published previous Airport Master Plans in 2005 and 2012. The 2005 Master Plan states, *“The area required for landside airport facilities to the east of the railway needs to be substantially extended, primarily for car parking and road access to the new (third) terminal.”* and, *“The boundary to the east of the railway corresponds with that indicated in the White Paper.”* The 2012 Master Plan references safeguarding for a second runway stating, *“The area for landside airport facilities to the east of the railway would need to be substantially extended to accommodate a transport interchange (including areas for coach parking and car rental), car parks and front line ancillary facilities such as offices and hotels.”* It should be noted that ‘front-line ancillary facilities such as offices and hotels’ are not referenced in the later GAMP 2019 as part of the basis for land safeguarding. Of critical importance is that these earlier Master Plans, like the GAMP, do not provide ‘robust evidence’ to justify the extent of land required for safeguarding for future car-parking needs. Nor is such evidence contained in the GAL Airport Surface Access Strategy (ASAS, May 2018), which predated the GAMP.
42. The safeguarded land associated with a wide-spaced runway originated in the Aviation White Paper (The Future of Air Transport, DfT, 2003), which has since been withdrawn. This paper did not include any justification for an extent of safeguarded land, but did state, *“It must be stressed that the map was only indicative, pending detailed design work and submission of a planning application by the operator. The map should not therefore be taken to be a formal safeguarding map.”*
43. It is apparent that in all the published Airport Master Plans (2005, 2012, 2019) and also in the Airport Surface Access Strategy (2018), there is no explicit or evidenced design rationale for the extent of safeguarded land for car parking areas associated with an additional wide-spaced runway. The high-level plans provide the only basis for the extent of safeguarding, and in respect of land for long-stay parking, there is no assessment of need, alternative options development, evaluation and selection, as would constitute a rigorous master plan process. As such, **the criterion for robust evidence in the NPPF is not considered to have been met.**
44. The GAL representations to the 2021 DCBLP included an Annex that referenced, “GAL’s Second Runway Operational Efficiency Master Plan” is Appendix A5 of the Updated Scheme Design Submission (to the Airport’s Commission), issued in May 2014. While not currently available on GAL’s website, this published document contains a table describing the number of car parking spaces to be accommodated in the eastern zone. However, this document does not provide any explanation of the method by which these numbers have been derived, or the parameters on which any calculations have been based. As such, it also is not considered to provide robust evidence. The GAL representations are reviewed in more detail from Section 4.7 below.

4.4 Gatwick Airport – Car Parking Trends

45. The number of car parking spaces at Gatwick has been increased since the publication of the 2005 Master Plan. The projected demand for parking has also been updated with each Master Plan revision.

Table 4-1 History of Existing and Projected Demand for Car Parking at Gatwick

		2005 Master Plan		2012 Master Plan		2019 Master Plan	
		Existing	2015 Demand Projection	Existing	2020 Demand Projection (40 MPPA)	Existing	2023 Demand Projection
Short-Stay		4,100	4,720	4,960	6,500	4,902	9,402
Long-Stay (inc. Valet and 'holiday')	On Airport	27,134	30,000	28,855	30,000	34,098	39,163
	Off Airport Approved	21,350	21,350	-	-	21,200	21,200
	Un-approved	2,400	-	5,800	Decreased	-	-
	Sub-total	50,862	51,350	-	-	55,298	60,363
Staff		-	10,000	7,000	-	6,200	6,200
TOTAL		54,962 (exc. Staff)	66,070	33,815 (exc. staff & off-airport)	+6,000 by 2020	60,200	69,765

46. The previous Master Plans show a trend of increasing parking provision to support growth in air-traffic. This is summarised in the GAMP as a growth of 19.5% from 32,640 public spaces in summer 2010 to 39,000 spaces in summer 2017. Unapproved off-airport parking has been reduced (in line with GAL and CBC policy), while more intensified car parking arrangements have been accommodated within the Airport's operational area.
47. It should be noted that 'Off Airport Approved' has been maintained consistently at slightly over 21,000 spaces throughout these masterplans and their forward demand projections. Only the 2005 masterplan describes these as a mixture of "a number of long-established off airport car parks, run by specialist operators (16,668 spaces), and at many hotels (4,674 spaces)". These available 'off airport approved' spaces were not referenced in the 2014 submission to the Airport's Commission, inconsistently with the published masterplans.
48. In each case, there has been a predicted growth in demand over the following 5 to 10 years. This has been accommodated within the existing land ownership boundary through a variety of measures to intensify the parking density on the site. For example, the 2012 Master Plan stated, "*These additional spaces are expected to be provided by a mixture of decking and multi-storey car park construction on the site of existing surface car parks*".
49. Similarly, the GAMP describes recent and planned car parking projects that continue this intensification trend further within the next 5 years; "*We have recently completed a project to deck part of South Terminal's long-stay car parking to provide an additional 1,565 spaces...*" and "*we have identified two sites for additional multi-storey car parking, one at each terminal. MSCP 7 would create approximately 3,000 spaces in a multi-storey structure on the site of a current staff car park located just to the north of North Terminal. MSCP4 at the South Terminal would create approximately 1,500 spaces...*". Combined with "*3,500 spaces delivered by consolidation of our long-stay self-park product*

into one site and optimising the configuration of current storage areas” these projects “deliver 9,565 extra spaces throughout the period, or an increase of 24.5% from 2017 capacity”. Gatwick Airport submitted their planning application for proposed MSCP 7 at North Terminal in 2022 (Planning Application Reference No: CR/2022/0707/CON).

50. Looking forward, the GAMP indicates that the same approach would be followed for longer-term growth over the next 15 years (corresponding to a capacity range of 57 to 61 MPPA); “Additional car parking, or parking required to replace existing spaces lost owing to other developments, can be provided by decking more of the long stay car parks at North and South Terminals, as required. We are also exploring the use of machine assisted parking technology in the longer term to increase the capacity and utilisation of existing car parks.”

51. The EIA scoping report for the emergency (‘Northern’) runway DCO describes that “approximately 46,700 parking spaces were available in summer 2018 within the airport boundary” (including staff parking) and a further 21,196 authorised spaces off-airport. Projects to increase car-parking associated with the application include, “a new multi-story car parking capacity: 4,250 spaces” and “Use of robotics technology within existing long stay parking areas resulting in an additional 2,500 spaces”. This would result in a total of 53,450 spaces on-airport.

The total provision of new parking also considers; “to replace existing parking spaces, lost due to development associated with the Project” ... “The overall net increase in car parking spaces would be approximately 17,500”. Existing (green) and new parking (purple) areas are shown in

52. **Figure 4-5** below.



Figure 4-5. Existing and Project car-parking – EIA scoping report, Volume 2, Figures.

53. There are a number of car parking trends that should be highlighted including: the ratio of parking spaces to airport passengers and staff; the correlation with mode-share shift targets; the ratio of short-stay to

long-stay parking, and the intensification of parking density through decking, MSCPs, configuration optimisation and robotic parking systems.

54. It is clear from these trends that considerable increases in car-parking provision have been achieved ranging from the 2005 Master Plan (31,234 passengers + 7,200 staff) to summer 2018 (39,000 + 6,200 staff), with a further 9,565 spaces planned (GAMP 2019) up to a total of 17,500 new and replacement (DCO EIA scoping). This has all been achieved within the existing airport boundary (with a further 22,000 authorised spaces off-airport) enabling growth from 32.8 MPPA to a throughput of 46.4 MPPA in 2018 and more than doubling to a planned capacity of 75 to 80 MPPA in the DCO PEIR in 2021.
55. The land safeguarded for a wide-spaced runway to the south was first established in the Aviation White Paper in 2003 and has been carried forward with some adjustments through Airport Master Plans to date. It is apparent that the extent of the Safeguarded Land in the GAMP has not considered the achievements described above, including the intensification of car-parking land-use within the existing airport boundary since 2005 to date and projected to continue through to 2047.

4.5 Gatwick Airport – Sustainable Transport Mode Share

56. GAL has emphasised its commitment to a sustainable transport policy in its ASAS (2018);, *“Gatwick’s commitments are to improve our public transport mode share for passengers and staff, provide sustainable travel choices and reduce the environmental impacts of surface access”* and in the GAMP, *“We expect to be held to our commitment to promote sustainable travel for our passengers and staff, and we will work with our partners and service providers to deliver safe and efficient access 24 hours a day, seven days a week”*.

Table 4-2. History of Mode Share at Gatwick

	2004	2011	2017
Private Car	51.7%	42.4%	38.6%
Hire Car	2.3%	1.8%	0.9%
Taxi	15%	13.3%	15.4%
Bus/Coach	6.8%	6.7%	5.9%
Rail	24%	35.5%	39%
Other	-	0.3%	0.2%

Source: 2005, 2012 Master Plans and 2018 ASAS, referencing CAA passenger surveys in preceding years

57. The historical trend of mode share shift towards public transport is apparent from the recent published Airport Master Plans. While taxi, bus and coach use has not altered significantly, the biggest transition is to rail (up by 15% over 13 years) and away from private cars (down by 13% in the same timeframe).
58. In 2012, it stated that of the 42.4% using private cars, *“Car parking is an essential function of the airport operation with around 22% of passengers accessing the airport by a private car, which is parked here”*.
59. This led to GAL setting targets in the GAMP to further progress this trend of mode-share shift, as shown in Figure 4-6. This has, in effect, superseded the earlier mode share targets contained in the ASAS to 2022 and noted at paragraph 34. These include rail to increase to 45% by 2030, an increase in use of bus and coach by staff and passengers, and a reduction in staff parking spaces, all corresponding to

sustainable travel initiatives.

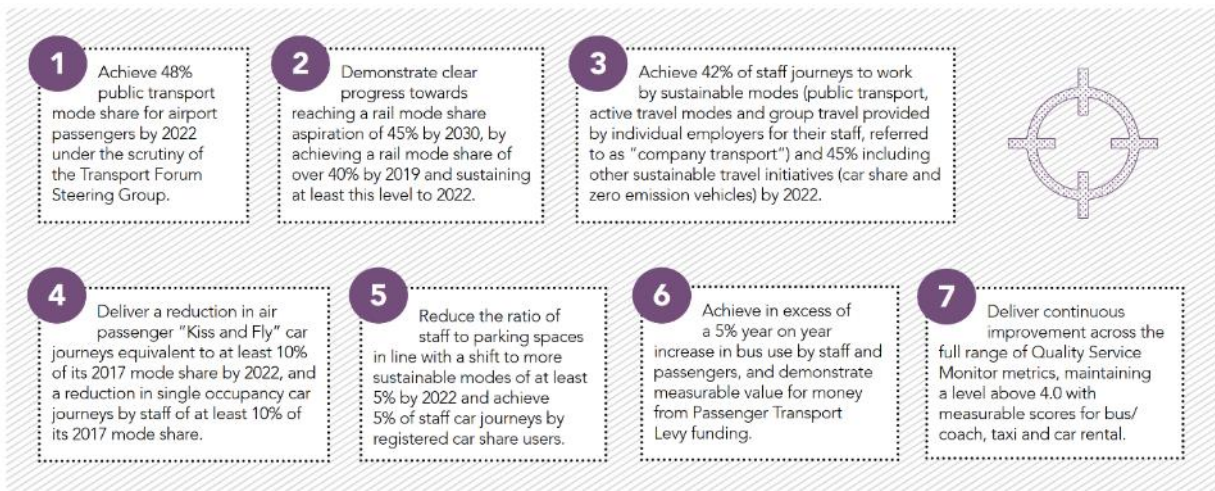


Figure 4-6. Mode share targets, extracted from GAMP 2019

60. During the independent Airports Commission study, each of the sites made submissions to outline their proposals to deliver additional runway capacity. GAL’s submissions included an indication of its plans for Surface Access that stated; *“Gatwick will achieve the highest use of sustainable modes of transport: it will achieve a 60% public transport mode share for customers (46m by 2050) and a 50% sustainable mode share for staff”*. These were illustrated in the graphs shown in Figure 4-7 and Figure 4-8:

FIGURE 1: CHANGE IN MODE SHARE (AIR PASSENGERS)

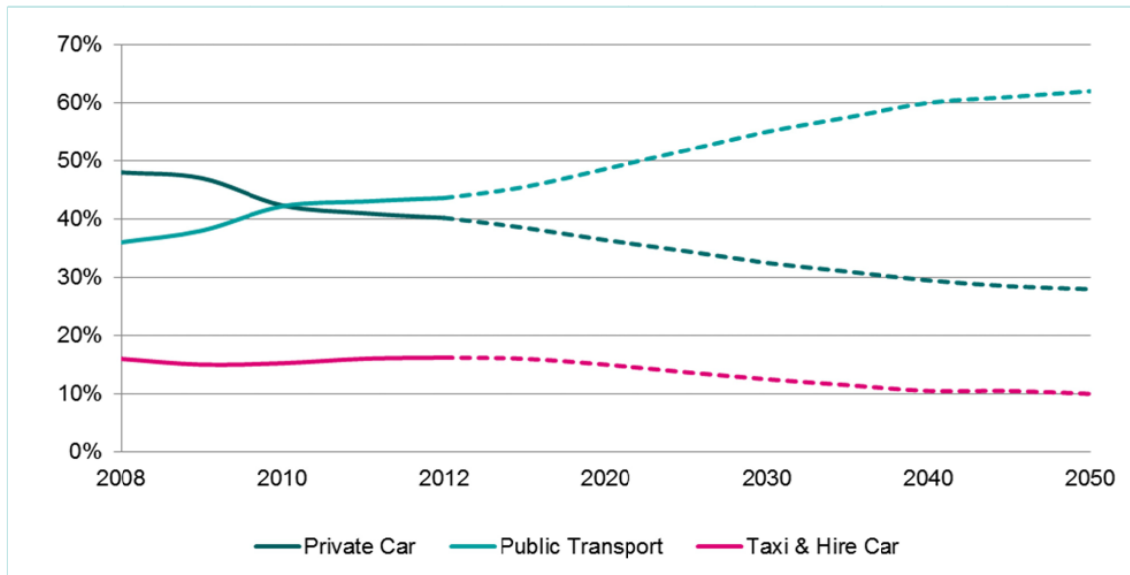


Figure 4-7. Mode share targets, extracted from SD6 Surface Access submitted to Airports Commission

FIGURE 2: CHANGE IN MODE SHARE (EMPLOYEES)

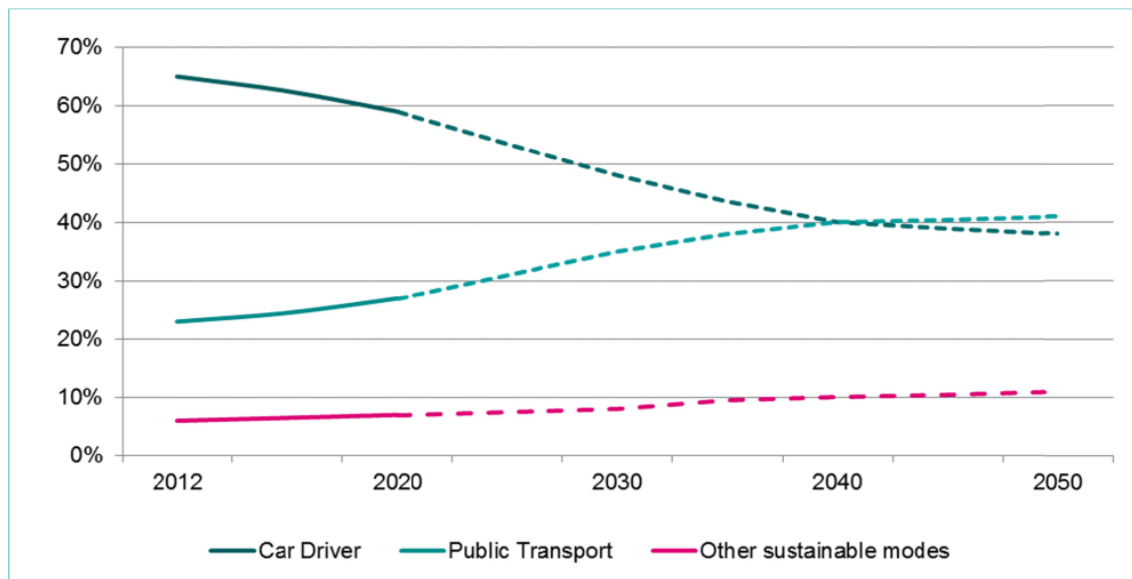


Figure 4-8. Mode share targets, extracted from SD6 Surface Access submitted to Airports Commission

61. Significant progress has been made since 2004 in improving the public transport mode share from 31% in 2004 (bus/coach and rail) to 45% in 2017 for passengers. Targets associated with the development of a wide-spaced runway to the south aim to continue to improve to over 60% by public transport for passengers and over 50% for staff (up from 30% in 2012). All of this contributes to a decreasing dependency on surface access by private car, (and thereby parking), by passengers and staff as a mode share percentage that offsets any growth in air-traffic.
62. This significant change has taken place since the Aviation White Paper in 2003 and should also be considered when updating any assessment of the land area required to be safeguarded for landside infrastructure for surface access associated with an additional wide-spaced runway to the south.

4.6 Airport Industry Trends in Car Park Intensification

63. Airports typically cover considerable land areas and, within landside areas, car parking is one of the significant drivers of land-use, of which, a significant proportion can be surface parking for long-stay. Airports are also in the relatively unique position of knowing, from booking systems, that many of these cars will be parked for a considerable period (from days to weeks) and when the vehicles will require to be collected/accessed. This enables unique opportunities for land-use efficiency, which have been adopted (due to valid business cases) at airports around the UK. The following paragraphs note some examples of this.
64. Block parking is a system by which vehicles, that do not need to be accessed for a finite period, can be arranged in a dense grid, without the need for circulation roadways (that can accommodate shuttle buses) that are typical of surface parking. This is often used for valet products and could also be applied to long-stay car parks with appropriate management. Figure 4-9 shows an example from Manchester Airport.



Figure 4-9. Example of block parking at Manchester Airport, UK

65. Robotic parking is a further evolution of block parking. This approach uses robots to position cars in a grid array in a similar fashion to block parking. However, because there is not a valet driver who needs to exit the vehicle by opening the doors, it is possible to arrange cars with a smaller gap between adjacent vehicles. The robotic technology has been developed and has been trialed at Charles de Gaul Airport in Paris and also at Gatwick Airport, which Stanley Robotics reports to achieve 50% more vehicles within the same area relative to conventional surface parking.

Figure-4-10-shows-an-example-image



Figure-4-10.Example-of-robotic-parking

66. Decked car-parking provides a low-cost, light-weight structural solution that typically allows for an increase in parking density by creating a relatively easily accessible second level of parking, roughly doubling the number of cars that can be accommodated each area. Examples of this type of light weight decking solution are available at Gatwick in their long-stay parking and at Heathrow by Purple Parking.
67. Multi-storey car parks offer the greatest number of vehicles in a given area. They are typically used for short-stay applications at airports where space and land-value are at a premium. However, this is not universally the case. An important and clearly relevant case study can be seen in the Heathrow public consultation documents that were available during preparations for the 3rd runway DCO application. In this case, the northern and western 'parkways' were proposed as multi-storey long-stay car parks, in the context where additional land was to be obtained through Compulsory Purchase Orders to enable the development of a new runway and associated infrastructure. While multi-storey car parks have a higher capital cost than surface car parks, they clearly reduce the amount of land that is required for long-stay car-parking. Figure 4-11 shows location options considered for these long-stay 'parkways'.

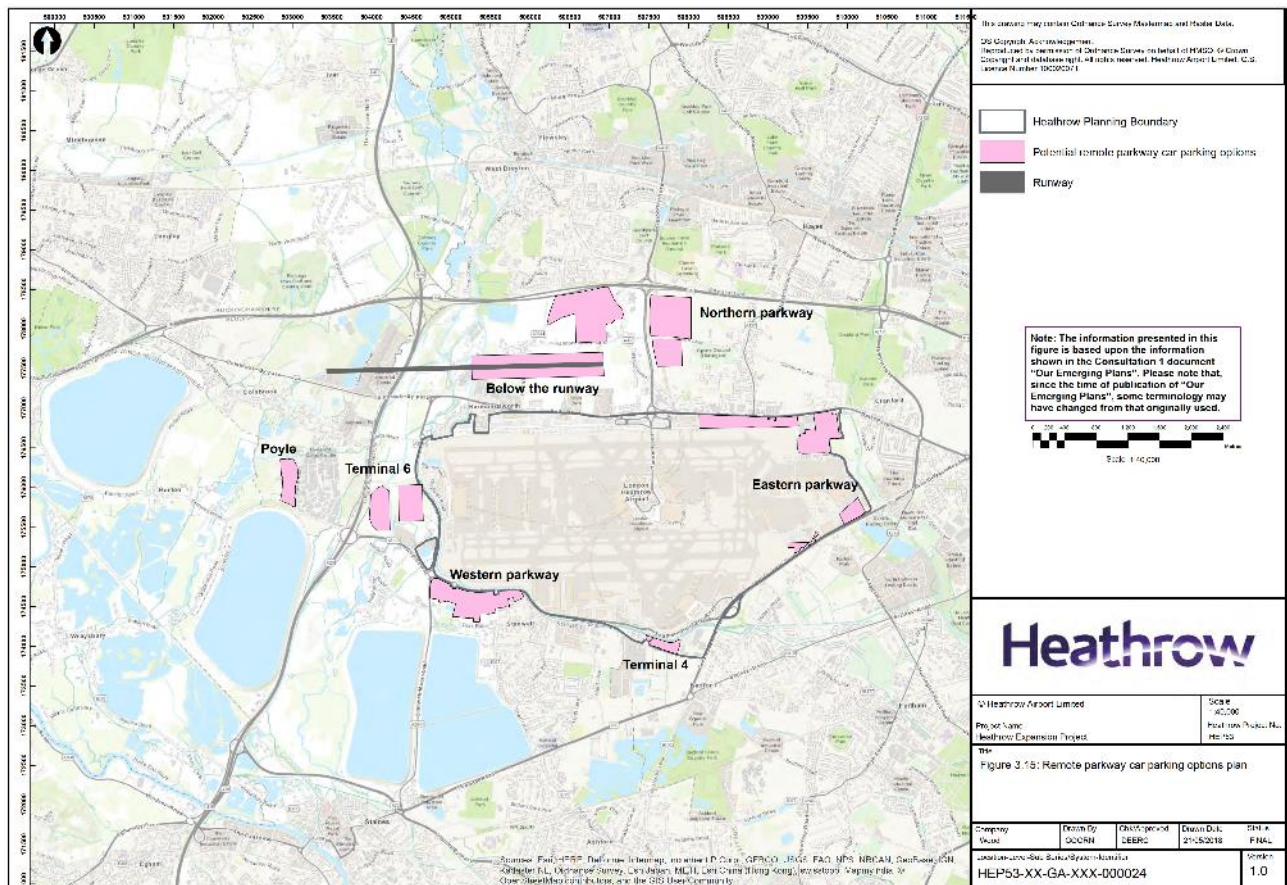


Figure 4-11. Sites considered for long-stay car parking in the Heathrow 3rd runway EIA scoping report

68. All these examples provide case studies of ways in which car-parking land use can be intensified in an airport context. It is also important to note that many of these options have been adopted by Gatwick Airport in the recent past and form part of its plans for future growth, including the emergency runway DCO application, while remaining within its existing operational/land-ownership boundary. These innovative and more intense parking arrangements could equally be applied to the Airport's further growth as part of its wide-spaced southern runway proposals, as opposed to surface parking.

4.7 Safeguarded Land - proposed number of car parking spaces

69. GAL's representations to the 2021 DCBLP included an Annex relating to safeguarded land (GAT 2), hereinafter referred to as 'The Annex'. It includes a reference to "GAL's *Second Runway Operational Efficiency Master Plan*", Appendix A5 of the Updated Scheme Design Submission (to the Airport's Commission), issued in May 2014. This was indicated as the basis for the extent of the land safeguarded for long-stay car-parking.
70. Appendix A5 contains Section 3.7 relating to the Eastern area developments, referring to the land to the east of the railway line (and west of the M23). It provides the following table (Figure 4-12) describing the number of parking spaces that the safeguarding land area is based upon. The sum of long-stay, block parking and staff parking match the 95,750 spaces described in The Annex.

	2050
Car Parking	
Short Stay - Number of MSCP	9
Short Stay (spaces)	8,500
Long Stay (spaces)	59,750
Long Stay as Block parking (spaces)	23,900
Staff (spaces)	12,100

Table 3.7_1 Car Parking Provision for Eastern Zone

Figure 4-12. number of car parking spaces (GAL submission to Airport Commission, 2014)

71. It should be noted that this submission to the Airports Commission did not include any calculations of how these numbers of car parking spaces had been determined or any justification of the basis upon which they had been estimated. Therefore, referencing this source does not constitute 'robust evidence'.
72. It should also be noted that this table specifically mentions that 23,900 of the 95,750 parking spaces would be 'block parking', which, as noted above, is more spatially efficient than conventional surface parking. This is not described or considered in The Annex, which would therefore over-estimate the land area required.
73. The GAL submission to the Airports Commission was issued and published in 2014. GAL has since updated and published their Airport Surface Access Strategy (ASAS) in May 2018 and their Masterplan in 2019, but these two documents do not update the projected car-parking demand associated with a wide-spaced southern runway.
74. As a part of DCO application to bring the emergency ('Northern') runway into operational use, GAL submitted an EIA scoping opinion in 2019 and a Preliminary Environmental Information Report (PEIR) in 2021. These updated the baseline parking numbers in line with recent development projects.
75. It is clear from these recent published documents that the baseline parking provision has changed since the submission to the Airport's Commission in 2014, including the provision of new short-stay multi-story car parks, efficiencies in long-stay parking and innovative new initiatives in parking management and

robotic automation. It is therefore likely that if the Airports Commission design calculations were to be updated, (because they are no longer accurate), they would take this new baseline into account and derive a different result, with a reduction in the number of long-stay parking spaces required. Below we discuss the implications of these recent developments on the safeguarded land assessment described in the Annex.

76. The GAL submission to the Airports Commission indicated that the short stay parking provision of 5,000 spaces (in 2014) would only increase to a total of 8,500 spaces, (in table 3.7 above), to support the third terminal associated with the wide-spaced southern runway. Figure 4-13 below shows a further four proposed MSCPs immediately adjacent to the new terminal building, which would provide these additional 3,500 short stay parking spaces.



Figure 4.5.2_3 Short stay car parks and car hire

Figure 4-13. Additional short stay MSCPs (GAL submission to Airport Commission, 2014)

77. Conversely, the ASAS, GAMP and DCO application indicate that current development projects (MSCP4 and MSCP 7) will increase short-stay associated with the two existing terminals to over 9,000 spaces (as opposed to 5000 spaces in 2014), increasing the baseline by 4,000 spaces, and that this could continue to grow further to support the additional traffic enabled by the use of the northern runway.
78. As the total parking demand is a constant, determined by passenger numbers and mode share, then this over-provision of short-stay parking (on existing airport land) will offset the future requirements for long-stay parking (in the Eastern area), if a wide spaced southern runway were developed.

79. The PEIR includes a projection of long-stay parking demand associated with the growth in air traffic to 75.6 MPPA (million passengers per annum) in 2038, enabled by the use of the existing northern runway. This increases long-stay parking to only 57,798 spaces and retains current staff parking levels at 6,200 spaces. As an efficiency metric, this equates to less than 850 spaces per MPPA.
80. When compared to the submission to the Airports Commission in 2014, the 95,750 spaces, (which comprised 83,650 long-stay and 12,100 staff parking), related to 95 MPPA, gives an efficiency metric of over 1000 spaces per MPPA. On this pro-rata basis, it is clear that current requirements (PEIR in 2021) are considerably more efficient in terms of long-stay and staff parking demand than was assumed in 2014.
81. This is significant for two reasons. Firstly, it is reflective of the ongoing trend shifting towards public transport mode share. GAL is actively pursuing this shift in travel behaviour as described in their recent ASAS (2018) and Masterplan (2019).
82. Secondly, the staff parking allowance of 12,100 spaces (from table 3.7 above) is almost double the 6,200 spaces today. Conversely, however, in the DCO PEIR, the staff parking is retained at 6,200 spaces, despite increases in MPPA, indicating a significant staff mode share shift. This is also very different from trends at other airports aiming to reduce the proportion of staff parking, as their mode share choices are easier to influence than passengers. For example, the Heathrow 3rd Runway DCO application described staff parking reducing from 24,800 spaces in 2016 to 12,100 spaces by 2040 – a reduction to under 50%, despite higher MPPA. It is clear that the staff parking provision used in The Annex is un-realistic and would be considerably lower if it were updated today, as demonstrated by the DCO consultation documents.
83. The other, very significant, omission from the 2014 submission to the Airports Commission is that it does not mention 'Off Airport Approved' parking. These spaces have been included in the categories of long-stay parking supply in each of the published masterplans, surface access strategies and the DCO submissions, from 2005 to date. The quantum of 'Off-Airport Approved' spaces has been consistently 21,200 spaces, contributing to the long-stay total. These are provided at hotels that support Gatwick Airport and by long established specialist operators, as described above. There is no indication that these companies would cease to provide this service in the event of the development of a wide-spaced southern runway. Therefore, it must be assumed that the 21,200 approved spaces would continue to be provided 'Off Airport', rather than within the Eastern area development.
84. The full beneficial impact of some of the points raised above cannot be quantified without undertaking a full surface access study associated with a future wide-spaced southern runway, updated from 2014, to take into account trends such as mode share shift.
85. However, even without this level of analysis, it is clear that the figure of 95,750 spaces used in The Annex is a clear over-estimate of demand that does not take into account a number of the quantifiable points raised above. The existing provision of additional short-stay MSCPs since 2014 (creating a total of 9,400 in the GAMP) and future short-stay MSCPs for a new terminal (adding a further 3,500) would account for 12,900 spaces rather than the 8,500 described in table 3.7 above. As the total parking demand is constant this would offset the long-stay requirement by 4,400 spaces.

86. The provision of 12,100 staff car parking spaces for the wide-spaced southern runway is disproportionate to the existing 6,200 spaces, as retained in the northern runway PEIR. This indicates an over-allowance of at least 4,300 spaces even taking into account pro-rata staff growth from 75.6 MPPA (northern runway) to 95 MPPA (wide-spaced southern runway).
87. It is clear from the published masterplans that the total long-stay parking spaces includes 21,200 'Off Airport Approved'. The long-stay parking allowance of 83,650 spaces (of which 59,750 conventional and 23,900 block parking), is a higher ratio of long-stay than in the DCO PEIR and is representative of the total long-stay parking demand. As such, the requirement for the safeguarded land (eastern area) should be reduced by the 21,200 spaces 'Off Airport Approved' that are described in the published Airport Masterplans, ASAS and DCO application documents.
88. The combined effect of these quantifiable trends alone is a reduction in demand of 29,900 spaces, comprising 4,400 short-stay, 4,300 staff parking and 21,200 off-airport approved. This would leave a residual demand east of the railway of 65,850 which is over 30% lower than the 95,750 considered in The Annex. This is summarised in table below.

Car parking spaces	GAL representations	Realistic	Correction	Basis for Correction
Source / basis	(2014, Appendix 5)	GAMP, DCO	As described above	Recent GAL projects, GAL published documents
Short Stay	8,500	12,900	-4,400 less long-stay	9,400 (inc. MSCP4+ MSCP7) + 3,500 (new terminal)
Staff Parking	12,100	7,791	-4,309 less staff spaces	6,200 x 95 / 75.6 MPPA
Long-stay	83,650	79,250	-4,400	Over-provision of short-stay
Block parking / Valet	0	23,900	+23,900 less area	Appendix 5, 2014
'Off Airport Approved'	0	21,200	-21,200 Off-airport	GAMP, ASAS, DCO
Conventional parking	83,650	34,150	-49,500	Reduced by short-stay, block parking and 'Off Airport'
Sub-totals	95,750 long-stay + staff, 8,500 short-stay	87,041 long-stay + staff 12,900 short-stay	-8,709 +4,400	Reduced by staff, replaced by short stay
TOTAL	104,250 spaces	99,941 spaces	-4309	Reduced by staff
Requirement for Safeguarded Land	95,750 spaces (of which no block)	65,841 spaces (of which 23,900 block)	-29,909	Reduced by staff, short-stay and 'Off-Airport' (31%)

4.8 Safeguarded Land – areas available for parking

89. The total area of safeguarded land available for car parking east of the railway is described in The Annex as 138 hectares, as shown in **Figure 4-14** below.

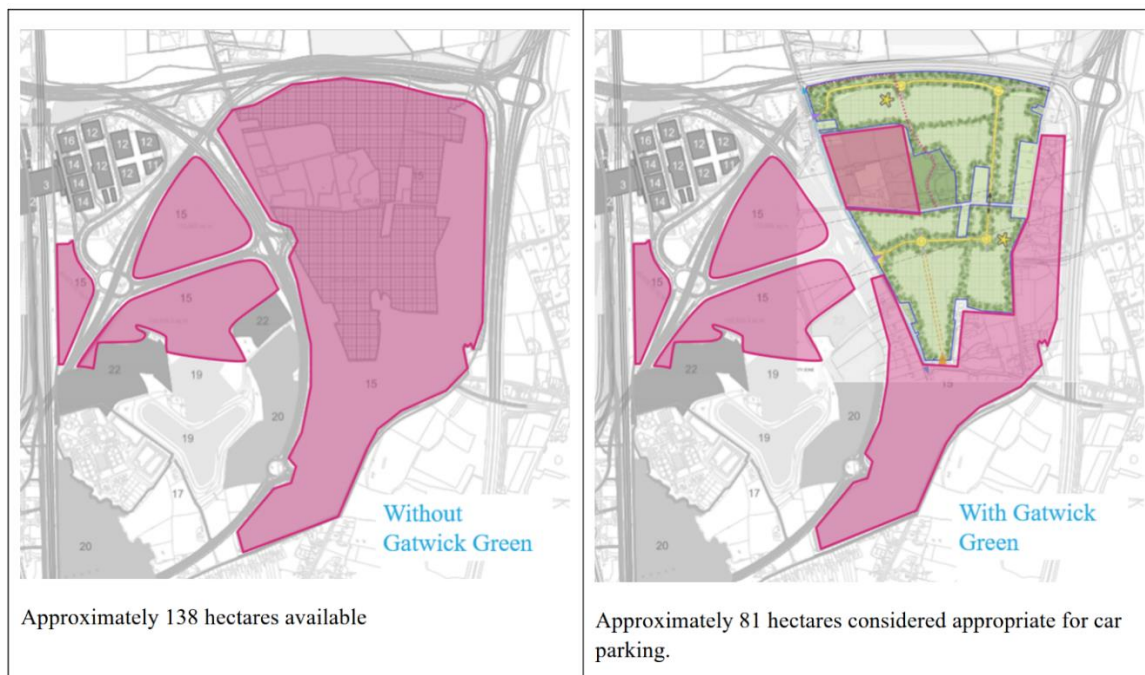


Figure 4-14. safeguarded land available for car parking, source: GAL representations to 2021 DCBLP

90. The safeguarded land available for car parking excluding Gatwick Green is described as 81 hectares above, a reduction of 57 hectares (from the 138 ha. described without Gatwick Green).

91. However, the DCBLP (local plan) has allocated only 44 hectares for Gatwick Green.

92. The discrepancy of 13 hectares (between 57 ha. difference described above and 44 ha. allocated) is partially due to an inconsistent measurement approach being applied to the two cases.

93. Some areas of land around Gatwick Green have been discounted, which indicates that they are possibly considered too small to be effectively used for car parking. However, as they accumulate to 13 hectares of land, which is equivalent to 6,500 conventional surface parking spaces (or close to 10,000 block parking spaces), it seems inappropriate to discount these areas without first carrying out a parking design layout to test their viability.

94. It should be noted that cars are relatively small and manoeuvrable relative to areas at this scale, which means they can effectively use narrow pieces of land, as can be seen in the other parcels of land being considered adjacent to the railway and new terminal access road.

95. It is recommended that any parking density comparisons should more accurately compare 138ha. of available land without Gatwick Green against, 94ha. of available land with 44 ha. allocated to Gatwick Green.

96. This would be an impartial comparison, rather than applying a subjective, and potentially, over-cautious

judgement to which particular areas will prove to be viable for car-parking or not. Otherwise, there is a risk that preferential perception bias is being applied that could impact the validity of the conclusions that have been reached.

4.9 Safeguarded Land - density of car parking types

97. The Annex provides a table 1 describing 'Typical car parking densities', based on experience at Gatwick Airport, as shown in **Figure 4-15** below.

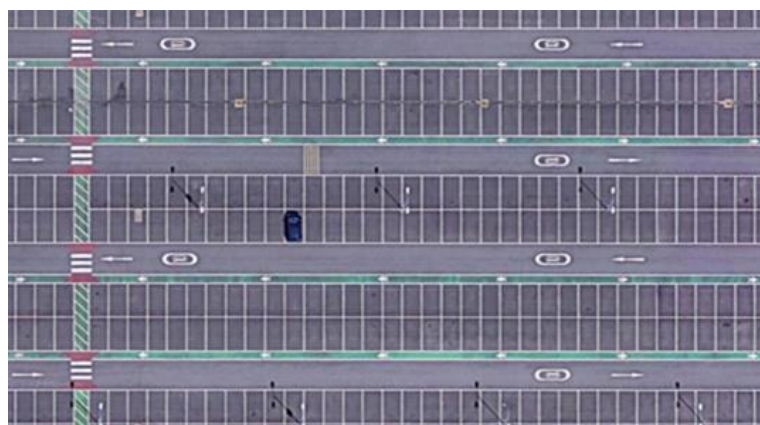
Table 1 – Typical car parking densities

Car park type	Car park density
Surface level	1 space per 20 sqm
Single deck	1 space per 31 sqm (15.6 sqm of ground floor area)
MSCP	1 space per 42 sqm (density by ground floor area subject to the number of floors)

Figure 4-15. Typical car park densities, source: GAL representations to 2021 DCBLP.

98. These are presented as typical rates for planning purposes, as they must allow for a range of scenarios and situations. However, the figures presented are high when compared to industry norms, particularly those for decked car-parks and multi-story car parks and will therefore over-estimate the amount of safeguarded land required.
99. On this basis, these planning parameters have been checked for industry good practice by comparing them against benchmarks at Gatwick Airport and other comparable UK airports, to determine if they are appropriate to use as a basis for safeguarding.
100. A parking space in UK is typically 2.4m by 4.8m to accommodate the majority of cars available. The width of aisles varies to allow more or less space for vehicle manoeuvring depending on the context and the frequency/intensity of use. Aviation industry good practice includes the provision of clearly marked pedestrian lanes for safety. A typical long stay example at Gatwick Airport has a 5.5m laneway including the footpath, resulting a depth of 15m by 2.4 for every two parking bays as shown in **Error! Reference source not found.** This translates into an area of 18 square meters (sqm.) per bay. The allowance of 1 space per 20 sqm for surface parking is considered reasonable for planning purposes (allowing for some inefficiencies due to entry and exit barriers, bus-stops, etc).

Figure 4-16. example of a typical surface long-stay car-park at Gatwick Airport



101. Theoretically a car-park with a single level of light-weight decking can achieve a maximum efficiency rating of double a surface car-park (i.e. for an average of 1 space per 20 sqm, which would be equivalent to 1 space per 10 sqm of surface area available). In practice this cannot be achieved, as there needs to be some spatial allowance for ramps, which are typically linear and space efficient.
102. Decked solutions are often rectangular for structural efficiency, which results in some surface parking around the perimeter if they are located within a plot that is not rectangular. These two factors can reduce the efficiency of decked car-park solutions. A review of benchmark examples at Gatwick and Heathrow Airports indicates a range from 20 sqm/bay up to 29.5 sqm/bay, with an average of 22.5 sqm/bay, depending on the parking configuration and the number of levels provided.



Figure 4-17. example of a typical decked car-park at Gatwick Airport

103. It should be noted that this form of light-weight construction, (often steel frame), varies from the heavier concrete construction methods used for multi-story car-parks. However, it is not limited to a single-deck above ground level. Purple Parking, at both Heathrow and Gatwick Airports, are 3 level solutions with two levels of decking above ground, increasing their spatial efficiency.
104. It can be concluded that the value of 31 sqm per bay on average used in The Annex lies outside the upper limit of the range of benchmarked examples. A figure of 25 sqm per bay would be more realistic of real world examples and can easily be exceeded by applying 3 levels and/or block parking solutions.
105. Multi-story car parks are commonly used at airports, as they provide an efficient land use and a higher density of parking provision. A range of benchmarked examples have been taken from Gatwick, Stansted, Manchester, Bristol and Heathrow Airports. They are also typically rectangular layouts, with external spiral ramps.
106. The range of spatial efficiency varies from 24 sqm/bay up to 34 sqm/bay with an average of 30 sqm/bay. The efficiency is typically driven by the size of the car park available (with larger MSPCs being more efficient due to a better ratio of bays to ramps) and are most efficient when located within a rectangular plot of land. These examples are typically in the range of 5 to 7 stories tall (with a highest of 9 stories at

Manchester Terminal 2).



Figure 4-18. example of a typical multi-story car-park at Stansted Airport

107. The figure of 42 sqm/bay used in The Annex lies considerably outside the upper range of benchmarked examples and is not representative of real world MSCP designs. A figure of 35 sqm per space for MSCPs is typical for planning purposes and is at the upper limit of the benchmarked examples.
108. The submission to the Airports Commission in 2014 indicated that 23,900 of the long-stay parking spaces could be arranged in a block parking configuration. This is appropriate for any valet parking and for the use of the robotic parking assistance that Gatwick Airport has already successfully trialled. The improved density of block parking has not been included in **Figure 4-15** above from the Annex, and has disregarded, when it should have been considered for this significant quantum of block-parking.
109. The benefits of block parking are that there is less need for aisles to access each vehicle independently. By eliminating the aisles between every second row of car parking bays the space per bay improves from 18 sqm/bay to under 12 sqm/bay.
110. Robotic parking enables narrower bays, due to drivers not needing to open car doors to access the vehicle. The robotic supplier to Gatwick Airport indicates that their system also achieves an improved spatial efficiency of 50% relative to conventional parking, validating this parameter.
111. The supplementary information to GAL's 2022 planning application for a new MSCP 7 adjacent to North Terminal indicates that robotic parking is intended to deliver an incremental 2,500 spaces within the next 5 years, indicating that this spatial efficiency solution delivers sufficient value to Gatwick Airport.
112. It should be noted that block parking is not exclusive to surface parking. **Figure 4-17** above shows an example at Gatwick Airport of a block parking arrangement being deployed in a decked car-park, combining the land-use efficiency gains of these two methods.
113. The following table indicates the density of car parking that has been found by benchmarking car parks at Gatwick Airport and comparable UK airports, including block parking. These parameters have been

used to assess the required areas of safeguarded land required in Section 4.12 below.

Car Park Type	Car Park Density (space per bay)	Car Park Density (space per bay at ground level)
Surface	1 space per 20 sqm	1 space per 20 sqm
Block parking (surface)	1 space per 13 sqm	1 space per 13 sqm
Decked car park	1 space per 30 sqm (single deck, conventional layout) 1 space per 25 sqm (double deck, conventional layout)	1 space per 15 sqm. 1 space per 12.5 sqm.
Decked block parking	1 space per 20 sqm (single deck, block parking)	1 space per 10 sqm
Multi-storey car parks	1 space per 35 sqm (conventional layout)	Dependent on number of levels 1 space per 7 sqm (if 5 levels) 1 space per 5 sqm (if 7 levels)

Table 4-3: car-park densities for planning purposes from benchmarks

4.10 Height Limitation to Car Parking

114. The Annex states that, “the land west of the A23 would be limited to one deck due to aerodrome safeguarding height constraints.”

115. This is referring to the Obstacle Limitation Surfaces (OLS) that protect flight safety from developments that might otherwise present an obstacle and a hazard to flight procedures.

116. Of all OLS, the most onerous are the Take-off Climb Surface (TOCS) and the Approach Surface (APPS) associated with Gatwick’s existing main runway. Both surfaces rise at a gradient of 2%, however, in this case the approach surface to runway 26L is less onerous to development as a result of the inset landing threshold, meaning that the surface starts further to the west and is higher than the TOCS at any given location on the extended runway centreline.

117. The Take-off Climb Surface is associated with departures from runway 08R. This surface starts at the end of the paved runway at the end of the Take-off Distance Available (TODA). Rising at a gradient of 2%, this surface has risen by 8m prior to the first car park, which is located 400m from the end of the paved runway. The second car park starts at a distance of 550m from the runway end and would therefore be limited to an 11m height. The majority of the existing south terminal long-stay car-parks start at a distance of 750 to 800m from the end of the runway and so would be limited to a height of 15 to 16m. By the time the A23 is reached the surface has risen to 25m above the runway threshold level.

118. Car parks are typically design with a 3m floor to floor height to allow sufficient clearance for most conventional vehicles as well as a reasonable allowance for structural depth, lighting and signage.

119. Therefore, only the first car park would be limited to a single deck. The second car park could accommodate an additional level of decking. The majority of car parks closer to the A23 could be MSCPs of a minimum of 5 levels and up to a maximum of 7 levels. This is shown in the diagram below.

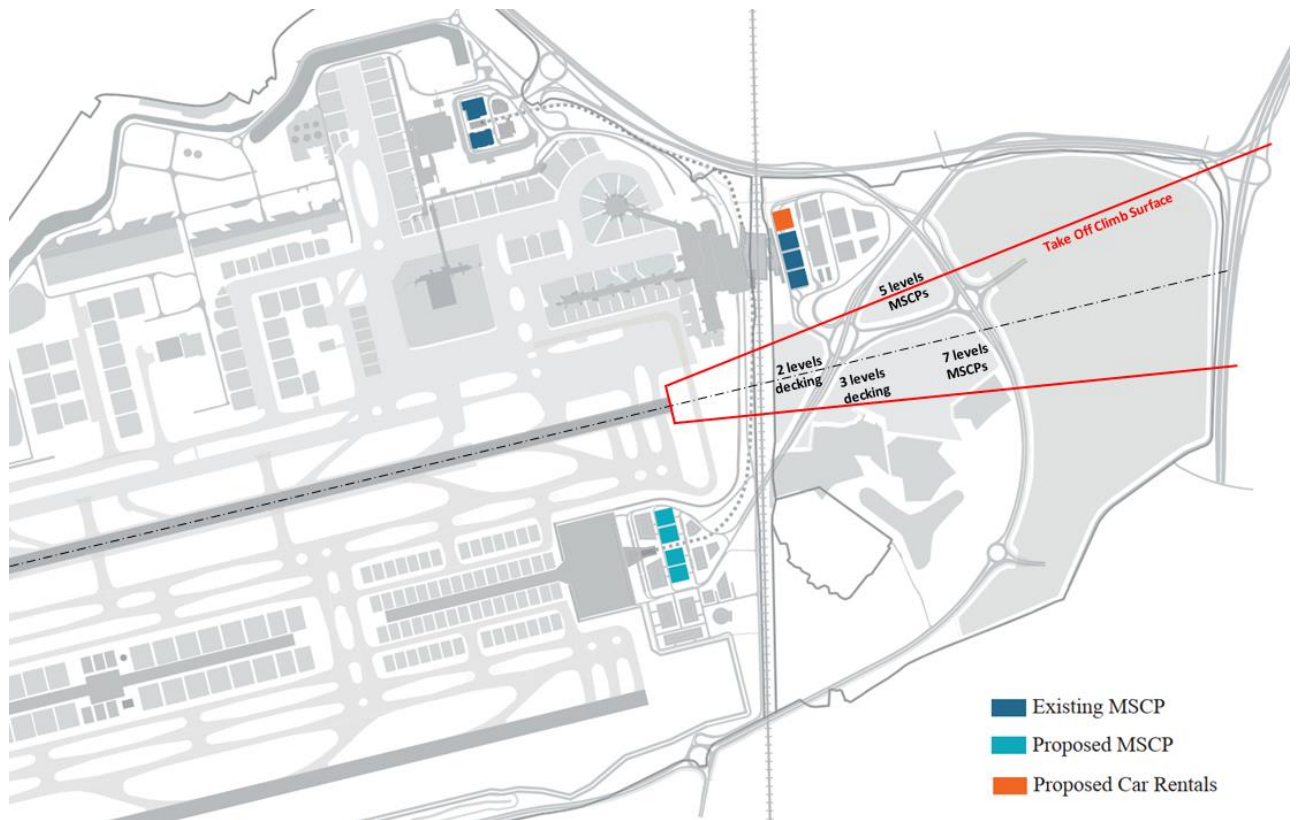


Figure 4-19. height limitations to car parks due to obstacle limitation surfaces

4.11 Commercial Viability of Long-Stay MSCPs

120. The Annex states that, “GAL notes that it is not viable for long stay products to be provided through constructing MSCPs, given the added construction costs and lower financial returns from passenger charges for long stay parking.”

121. The commercial viability of a MSCP is complex and, to be assessed robustly, would depend on a number of factors. This would include the levels of demand and utilisation, the pricing structure (e.g. rate per bay per day/hour), the cost of development, how the project would be financed and the return on investment required. This cannot be assessed at this time, as it would also depend on the time of development and it is unknown if or when UK government will support a second wide-spaced runway at Gatwick Airport, via a future Airports Commission or otherwise.

122. In order to determine the commercial viability of multi-story long-stay parking, GAL would need to consider a combination of pricing levers, design choices, operational efficiency levers, and mode-share levers, etc, many of which factors are within GAL’s control. It should be noted that many airports charge a premium for valet parking, which is an increasing industry trend, and also enables the spatial efficiency gains of block parking.

123. Taken at face value, it is likely that the cost of construction of a concrete frame multi-story car park would be greater (per bay) than the cost of an equivalent capacity asphalt surface car park. However, this is just one element of the total costs that should be considered. An important additional consideration is associated with the total area of land take for parking.

124. Firstly, there is the cost of land purchase at fair market value, which must be considered even in the event that the land is available through Compulsory Purchase Orders, enabled by a Development Consent Order (DCO). This land cost will be multiple times greater for surface car parks than for MSCPs (due to the number of levels), offsetting the increased cost of MSCP construction.
125. Secondly there are all of the costs associated with the environmental impact considerations. A greater surface area of hard-standing creates more drainage network infrastructure, and larger balancing ponds, to attenuate the flows to achieve discharge consents. Similarly, recent updates to environmental regulations require biodiversity net gain. For a larger site area, more green space would be replaced by built environment, which would then have to be offset either within the development or off-site for the full development duration at additional cost.
126. All cost factors would all need to be considered to determine whether MSCPs cost more to develop than surface parking and, if so, by how much. The GAL representations do not include robust evidence to support this assertion that MSCPs are not commercially viable for long-stay parking.
127. Long stay car parking does typically generate a lower rate of revenue (per bay, per hour) than short stay car parking at airports, due to demand and convenience. However, this does not necessarily mean that long stay MSCPs are not commercially viable.
128. An important benchmark for comparison is the Heathrow 3rd Runway Development Consent Order. This scheme did not reach a final submission and decision, due to a combination of factors including a judicial review and the impact of the Covid pandemic. However, prior to this, the development masterplan scheme underwent two rounds of public consultation. One particular feature of this scheme was that all long-stay car parking was to be consolidated into two 'Parkways'. One of these was to be located close to M4 Junction 4, while the other was to be located close to M25 Junction 14. Each of these Parkways consisted of multiple MSCPs and were to be connected to the terminal areas by an electric powered transit system.
129. Heathrow's decision to adopt the Parkways approach was in part influenced by the need to Compulsory acquire the necessary land for surface car parking, the consideration of the social and environmental impacts of the development on neighbouring communities and cost. In this context of a DCO, it was concluded that land-take associated with extensive surface parking for long-stay was not the right approach for a new runway development. However, this does indicate that MSCPs were considered to be commercially viable for long-stay parking.
130. Another relevant example is the Gatwick Airport Planning Application, submitted in 2022, for a proposed MSCP 7 at North Terminal (Planning Application Reference No: CR/2022/0707/CON).
131. The delegated report indicates that this 8 story MSCP (ground + 7 levels) with a capacity of 3,200 bays is to be used for pre-booked passengers on a medium stay basis (typically 3 to 8 days).
132. Short-stay parking is typically considered to be anything from a 15-minute quick pick-up to an airport visit within a day. Very few passengers are prepared to pay short-stay parking rates for a duration greater than 24 hours unless there is a special offer or their travel choices are not motivated by cost.

133. A trip of 3 to 8 days would typically comprise a business trip, a weekend break or a week-long holiday. Before the use of the phrase ‘medium stay’ this would have traditionally have been considered to be within the time-frame category of ‘long-stay’.
134. This indicates that MSCPs are commercially viable for long-stay at Gatwick Airport, as many of the 95,750 spaces described in the submission to the Airports Commission in 2014 would be used by passengers travelling within this 3 to 8 day timeframe.
135. Appendix A5 of the Updated Scheme Design Submission to the Airports Commission included an important note in Section 3.7 relating to the Eastern area developments as shown in **Figure 4-20** below.

3.7 Eastern area developments

The area to the east of the railway has been designated to accommodate a consolidated surface car parking zone which feeds all terminal buildings as well as providing a safeguard for commercial developments should these be required.

	2050
Car Parking	
Short Stay - Number of MSCP	9
Short Stay (spaces)	8,500
Long Stay (spaces)	59,750
Long Stay as Block parking (spaces)	23,900
Staff (spaces)	12,100

Table 3.7_1 Car Parking Provision for Eastern Zone

The area safeguarded for commercial developments, 35Ha, has been calculated on the assumption that some of the businesses impacted by the construction of the second runway, such as those in City Place, Manor Royal and Lowfield Heath, may need to be re-provided. These commercial developments would respond to their own business case which is separate from the second runway’s business case. Should these be required there would be a need to deck some of the surface car parking shown in the table above to keep the developments within the extended airport boundary.

Figure 4-20. extract from Appendix A5, GAL submission to Airports Commission, 2014

136. This clearly states that the safeguarded area could accommodate up to 35 hectares of commercial developments if they need to be re-provided. *“Should these be required there would be a need to deck some of the surface car parking, shown in the table above to keep the developments within the extended airport boundary.”*
137. This confirms that 138 hectares of safeguarded land was originally intended to accommodate surface parking (rather than decked car park solutions, as indicated in The Annex).

138. This also indicates the GAL accept the principle that car parking intensification to achieve greater parking density was acknowledged to be viable, through decking if necessary, to free up space for other land-uses.
139. Lastly, this accepts the principle that commercial developments could be accommodated within this safeguarded land area.

4.12 Summary of Safeguarded Land Area

140. To summarise the key points made above, the GAL objection to the 2021 Draft **Crawley Borough** Local Plan is supported by an annex that reviews the safeguarded land required for car parking associated with a wide-spaced southern runway. The basis of this assessment is a number of planning parameters that have been reviewed and are not found to be supported by robust evidence. This results in an over-estimate of the demand for car parking spaces and safeguarded land area.
141. The required number of car parking spaces of 95,750 has been sourced from an appendix to the updated scheme design submission to the Airports Commission. However, this 2014 submission does not take into account the following factors:
- a. Since 2014, there has been a considerable over-provision of short stay parking on existing airport land near to the North and South Terminals of over 4,400 spaces, which would be increased further by a third terminal associated with the wide spaced runway. As the total quantum of car-parking is constant, this over-provision of short-stay parking would offset the residual requirement for long-stay parking in the safeguarded land.
 - b. The number of car-parking spaces indicated for staff is disproportionate to the increase in traffic and does not reflect the reduced levels of staff parking in recent years. Even allowing for proportionate traffic growth there is an excess allowance for staff parking of over 4,300 spaces.
 - c. The assessment does not take into account the 21,200 spaces that are currently available as 'Off-Airport Approved'. These are acknowledged in the various published masterplans, airport surface access strategies and the DCO application for the emergency runway. There is no indication that these 'Off Airport Approved' car parking providers would cease to provide this service in the event that a southern runway is developed. Therefore these do not need to be re-provided within the Eastern area development.
 - d. The car parking demand does not include the method or basis on which it has been derived and does not transparently account for other factors such as mode-share shift of both passengers and staff.
 - e. Taking only the quantifiable factors into account, there is an over-estimate of the amount of car parking required of 29,900 spaces (over 30%). The realistic requirement for long-stay and staff parking is therefore 65,850 spaces as a basis for the safeguarded land, without re-calculating demand to take mode share shift into account.
 - f. Of these, it is clear from the GAL submission to the Airports Commission that 23,900 of the long-stay parking can be block parking, which has also not been taken into account. Only the residual 42,000 spaces would be conventional parking spaces.

This is summarised in the table below:

Type of Car Parking	Spaces assumed	Realistic demand	Correction
Staff parking	12,100	7,791	Reduce staff by 4,309
Short stay (over-provision)	8,500	12,900	Reduce long stay by 4,400
Long stay (Off Airport Approved)	21,200	Excluded from eastern area	Reduce by 21,200
Total spaces in Safeguarded Land	95,750	65,850	Reduce by 29,900
Block parking / valet	0	23,900	Reduce area due to density
Conventional spaces in east area	95,750	42,000	Reduced by 29,900 spaces and 23,900 block parking

142. The comparison of areas available for parking in the Annex does not take a consistent approach to the with, and without, Gatwick Green scenarios. There is a 13 hectare discrepancy between the size of the Gatwick Green allocation and the areas of safeguarded land that has been considered available for parking. This over-estimates the calculation of parking density required, which should more objectively consider the realistic 44 ha. allocated to Gatwick Green.

143. The type of car parking solutions required are based on a typical density of car parking supply. In reviewing the figures used against benchmark of decked and multi-story car-parks at both Gatwick Airport and comparable UK airports it is found the planning parameters used are outside the benchmarked range and are therefore over-estimating the number of MSCP levels required. The following parameters are found to be more realistic:

Type of parking	Parameter used	Benchmarks
Surface parking	20 sqm per space	20 sqm per space
Decked parking	31 sqm per space	25 sqm per space (depending on number of levels)
Multi story car parks	42 sqm per space	35 sqm per space
Block parking	Not used	13 sqm per space/

144. A mixture of decking and multi-story parking can be accommodated within the aerodrome safeguarding height limitations west of the diverted A23. This area is not limited to a single level of decking only as indicated in the Annex. A single level of decking is a limitation only for the long-stay car-park closest to the end of the runway (adjacent to the railway), increasing linearly up to 7 story MSCPs adjacent to the diverted A23 (the middle of the safeguarded land), if required.

145. Multi-story long-stay car parks have been described as not commercially viable, however this assertion is not supported by robust evidence. More detailed analysis would not only consider construction costs, but also take land purchase and environmental costs into account, both of which will offset the construction savings of surface parking.

- a. An example from the Heathrow Expansion DCO public consultations demonstrates an example where MSCPs for long-stay parking were determined to be commercially viable, particularly where the alternative of surface parking would have required the compulsory purchase (and social impact) of considerably more land.

b. Similarly, Gatwick Airport has submitted a planning application in 2022 for MSCP7 to accommodate pre-booked medium-stay parking for a duration of 3 to 8 days, demonstrating that this is cost viable. A majority of long-stay parking uses including business trips, weekend breaks and week-long holidays that would fall within this duration of stay.

146. By combining these various points summarised above, the Annex supporting the GAL representations is seen to be an over-estimate of the safeguarded land area required. It also gives an un-realistic estimate of the density of parking that would be necessary with the allocation of Gatwick Green.

147. The following table provides a direct comparison between the GAL representations and the findings of this assessment:

Parameter	GAL representations (Annex relating to GAT 2)	Realistic assessment
Area Available (without Gatwick Green)	138 ha	138 ha
Area Available (with 44 ha. Gatwick Green)	81 ha.	94 ha.
Number of spaces required (conventional)	95,750	42,000
Number of spaces required (block parking)	0	23,900
Density of spaces required (without Gatwick Green)	14.4 sqm per space	21 sqm per space
Density of spaces required (with Gatwick Green)	8.5 sqm per space	14.3 sqm per space
Type of parking required (without Gatwick Green)	Mixture of surface and decking	Surface parking only (without block parking)
Type of parking required (with Gatwick Green)	MSCPs with at least 3 levels	Decking or Block parking (or combination of)
Height limit to parking structures	Single deck only	Varies from single deck up to MSCP with up to 7 levels
Cost viability of long stay MSCPs	Not viable (stated without providing robust evidence)	Viable cases at Heathrow and Gatwick (also MSCPs are not required).

148. Each of these solutions in isolation can be seen to accommodate the parking demand in addition to the Gatwick Green land allocation. A combination of block parking and decking can be seen to very easily surpass the required car parking demand.

149. It can clearly be seen that the Gatwick Green land allocation is not prohibitive to safeguarding adequate space for car parking associated with a wide spaced southern runway.

4.13 Conclusions – GAT2: Safeguarded Land

150. Safeguarded land is required to protect for a future additional wide-spaced runway to the south of the existing airport. It is recognised that this expansion of the airport would require the development of a new terminal building and associated surface access infrastructure.

151. The extent of the land required for long-stay car parking associated with a wide-spaced southern runway (including to replace existing car parking facilities displaced by other airport land-uses) has **not been demonstrated with robust evidence to satisfy the requirements of the NPPF**.
152. The 2021 DCO application has demonstrated how additional parking to support growth to 75.6 MPPA with use of the emergency ('Northern') runway can be accommodated within existing airport land. The previously safeguarded land associated with 95 MPPA is not based on current infrastructure or supported by robust evidence to justify the area required.
153. This appendix has considered the significant developments in car parking provision since the DfT Aviation White Paper was produced in 2003 and the submissions to the Airports Commission in 2014. This includes considerations associated with **sustainable transport policy**; trends in **mode share shift to public transport** and the targets to progress these further to meet the objectives of the Airports Commission; the **intensification of car parking land-use** that has taken place and is planned under the DCO scoping proposals at Gatwick within existing land, block parking and valet parking products successfully adopted at other UK airports and finally the **automated parking products and solutions** that are available for use today that would enable further intensification of long-stay parking.
154. The GAMP provides no robust evidence to support the extent of land safeguarded for surface car parking: on the contrary, trends in automated and multi-storey parking clearly indicate the ability of GAL to accommodate its parking requirements in a significantly reduced safeguarded area. Furthermore, the Gatwick Green allocation does not block or prevent any critical infrastructure (such as runways, railways, terminals, new or diverted primary access roads) that are fundamentally required to be safeguarded for an additional wide-spaced runway to the south of the existing airport.
155. Taking all these factors into account Gatwick Green cannot be considered an incompatible development as it does not hinder sustainable aviation growth at Gatwick Airport. It is therefore fully compatible with any policy requirement to safeguard land for future national requirements. It also cannot be an inappropriate development, given the long-standing requirement for Strategic Employment Locations now addressed by the allocation of Gatwick Green in Strategic Policy EC1.
156. As such, the Gatwick Green allocation is entirely consistent with the policy and guidance on safeguarding for transport / aviation infrastructure contained in the NPPF (2019), the APF (2013) and the draft Aviation Strategy (2018).
157. The GAMP fails to justify safeguarding of the extent in the current adopted Policy GAT2 (adopted DCBLP, 2015). In the absence of such robust evidence, there is no case to justify the need for the Gatwick Green land for surface car parking as it is not critical to safeguarding airport expansion.

5 Conclusions

158. A review has been undertaken in relation to the future need for safeguarded land for airport-related car parking; the limitation on land uses and the requirements of the current airport expansion plans under the DCO. These reviews have concluded as follows:

- a) The Aviation Policy Framework introduced the need for airports, as critical transport infrastructure, to identify future airport expansion needs. It recommends that airports continue to prepare Master Plans as a clear statement of intent so that this can be given due consideration in local planning purposes.
- b) The National Planning Policy Framework (NPPF) states that there must be 'robust evidence' to identify and protect sites and routes 'critical' to developing transport infrastructure to widen choice and realise opportunities for large scale development.
- c) An Airport Master Plan should provide the robust evidence to justify the requirements for safeguarded land for infrastructure that is critical to the expansion of the airport.
- d) The Gatwick Airport Master Plan, published in 2019, indicates an area of safeguarded land for a future additional wide-spaced runway to the south of the existing airport, including an extensive area indicated for surface long-stay car parking between the London-Brighton mainline and the M23. It does not include any analysis or justification for the extent of this land area, instead deferring to preceding Master Plans, that also omit these details.
- e) In the recent past, two trends have dominated car parking requirements at Gatwick Airport, both of which are intended to be progressed further in current plans and targets. Firstly, there has been a significant improvement in modal shift to public transport principally from private cars to rail. Secondly, that additional car parking required to support growth in air traffic has been accommodated within existing airport owned land though the intensification of parking. GAL intends to continue both these trends to support anticipated growth over the next 15 years.
- f) There is no robust evidence available to justify the current extent of surface parking, that was initially indicated over 15 years ago. The Airport Masterplan of 2019 - the apparent justification for safeguarding - was not updated to take into account the well-established and continuing trends of a shift to sustainable public transport, parking density, valet parking and more recent innovative automated parking products that are more land-efficient.
- g) GAL's approach of safeguarding for surface parking in its Master Plan does not represent an efficient use of land given that there are more land-efficient alternatives including valet, block, decked and robotic parking. Whilst the airport is already adopting some of these more efficient parking methods and these are included in the Airport's stated sustainable transport / surface access strategy, there is no reference to these efficiencies in the plan shown for extensive surface parking for the wide-spaced runway. This evidence supports the Council's decision to remove part of this land proposed for safeguarding for extensive surface car parking and

instead allocate it for an industrial-led development to meet critical unmet needs is fully justified.

h) The Gatwick Green allocation is also considered to be compatible with the future development of the airport for the following reasons:

- It does not block or prevent any critical infrastructure (such as runways, railways, roads or terminal buildings) that are required to safeguard for an additional wide-spaced runway to the south of the existing airport.
- It does not hinder sustainable aviation growth at Gatwick Airport and is therefore fully compatible with any policy requirement to safeguard land for future national requirements.
- The site can be developed to be fully compliant with the land use requirements for PSZs, as described in the DfT's Circular 'Control of Development in Airport Public Safety Zones', updated in 2020.
- Gatwick Green can be designed to be fully compliant with all other aspects of Aerodrome Safeguarding that need to be considered to protect flight safety from the airport, i.e. in relation to heights of all buildings, bird strike hazard, cranes, lasers, glare and confusing patterns of lights. These will be considered and continue to be addressed as the scheme is developed through its design lifecycle.
- Gatwick Green is compatible with the Airport's short-term expansion plans for the use of the standby runway under GAL's proposed DCO application.

Project: Gatwick Green

Our reference: 100202103

Your reference: N/A

Prepared by: K James, P Ward

Date: 19 June 2023

Approved by: N. Mayer

Checked by: N Mayer

Subject: GAL Safeguarding Land

Revision: 2023-06-19

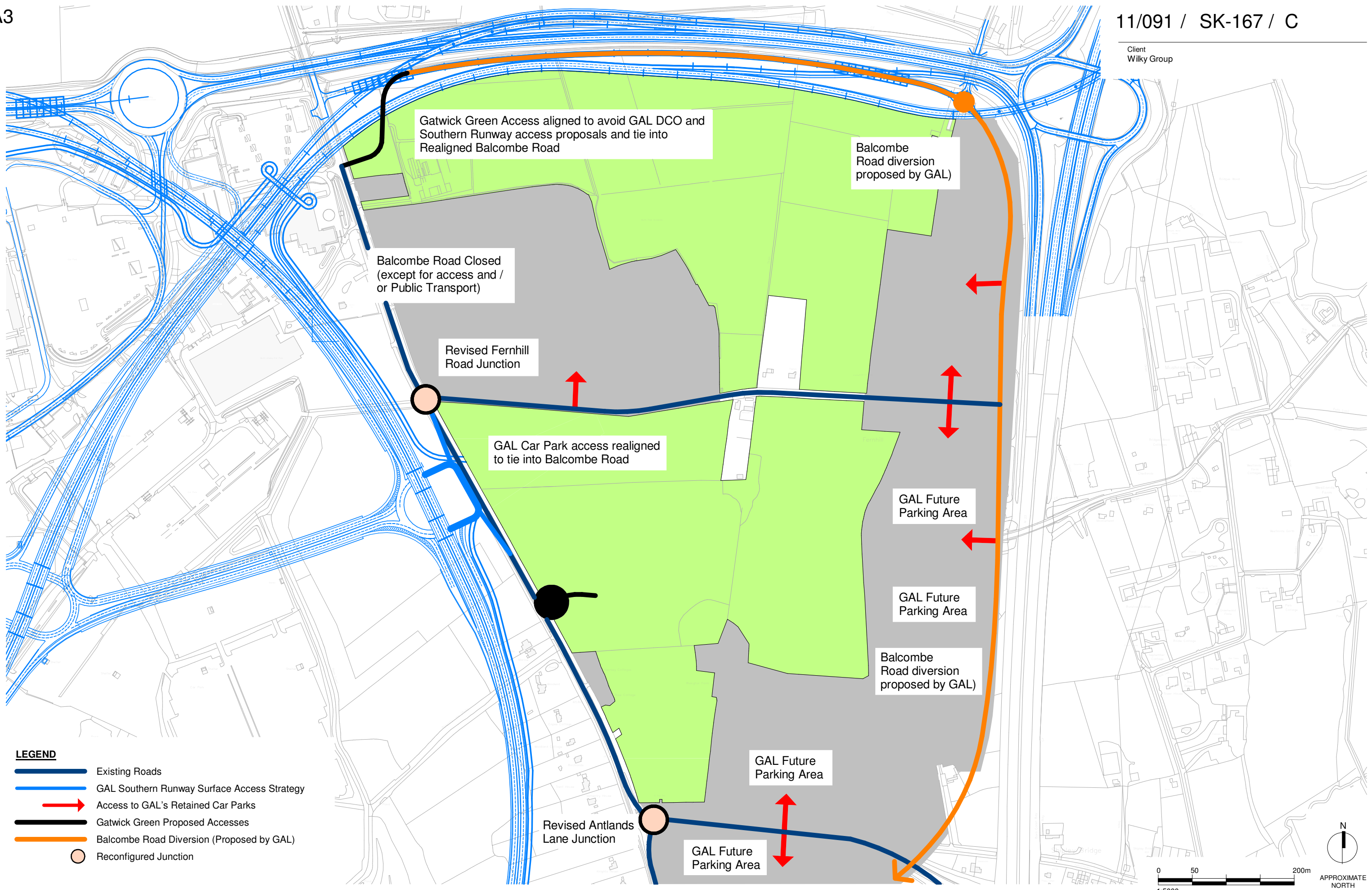
Appendix 5

Indicative Gatwick Airport Limited Car Park Access Plan



GatwickGreen

WHERE THE FUTURE WORKS



- LEGEND**
- Existing Roads
 - GAL Southern Runway Surface Access Strategy
 - Access to GAL's Retained Car Parks
 - Gatwick Green Proposed Accesses
 - Balcombe Road Diversion (Proposed by GAL)
 - Reconfigured Junction



Job N Drg N	Rev	Scale	Status
11/091 / SK-167	C	1 : 5000	PRELIMINARY
Date	Director	Author	Check
15/06/2023	JA	AH	--

Job
GATWICK GREEN

Drawing
Indicative GAL Car Park Access Plan

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes. Reproduced from Ordnance Survey mapping under Licence Numbers 100022432 & 100018493

This drawing may be scaled or cross referenced to the scale bar for Planning Application purposes only. Do not scale for any other purpose, use figured dimensions only. Subject to site survey and all necessary consents. All dimensions to be checked by user and any discrepancies, errors or omissions to be reported to the Architect before work commences. This drawing is to be read in conjunction with all other relevant materials.

Appendix 6

Matters for Discussion relating to Access Between Gatwick Airport Ltd and the Wilky Group / Gatwick Green Ltd



GatwickGreen

WHERE THE FUTURE WORKS

Matters for Discussion Relating to Access

Between Gatwick Airport Ltd and The Wilky Group

The following summarises those matters associated with the proposed development at Gatwick Green, on which Gatwick Airport, (GAL) and The Wilky Group, have discussed technical feasibility in relation to surface access. It is recognised that this represents discussions on points of technical detail only and this note is therefore a report on their current position. Most of the issues relate to safeguarding for the delivery of the wide-spaced second runway to the south of Gatwick (herein referred to as R2) for which a Masterplan has been published.

These discussions have not considered, nor do they relate to the determination of the Gatwick Green allocation for development within the Crawley Local Plan. Instead, the discussions consider some detailed aspects of the Gatwick Green Allocation that would benefit from review in the event that the principle of the allocation was to be taken forward, in order to minimise the incompatibility between any allocation and the R2 Masterplan.

Relevant matters

The following matters have been discussed between the parties.

1. The diversion of Balcombe Road in an East/West alignment across the northern sector of the Gatwick Green site south of the M23 Spur
2. The alignment of the proposed southbound off-slips from the M23 along with the northbound on-slips which have been designed to serve the new R2 terminal. These are shown on the plans received from GAL, to cross the northern sector of the GG site.
3. The proposed access arrangements into GG from the re-aligned A23 road to the west of the GG site, currently shown as a link, off a new roundabout just south of Fernhill Road.
4. The need to ensure access to zones, (retained in the areas surrounding GG) for the provision of airport parking, including where those access routes may impact on the Gatwick Green site.
5. Access to Gatwick rail station via Buckingham Gate, (on Balcombe Road) for buses, pedestrians and cyclists

The items for consideration focus on the issues which may be agreed in principle, (largely relating to matters of detail), should the allocation be confirmed as “sound” following the EIP and the Inspectors Report.

Progress towards in principle understanding and agreement.

Some progress has been made towards identifying the technical principles relating to access to Gatwick Green and the relationship with infrastructure associated with the R2 Masterplan. Whilst no agreement has been reached on any matter at this time, (June 2021), the parties will continue discussions. These will endeavour to support a formal statement of common ground once the representations have been submitted and in the lead up to the Local Plan Examination. This would be without prejudice to GAL’s position on the acceptability in principle of the proposed allocation on the Crawley Local Plan of Gatwick Green.

Appendix 7

Proposed changes to Policy GAT2



GatwickGreen

WHERE THE FUTURE WORKS

Proposed changes to the Draft Crawley Borough Local Plan 2024-2040 (May 2023)

Savills on behalf of Gatwick Green Limited

Changes to policy / text

Proposed changes to the policies and text of the DCBLP are set out below and are indicated by the following means:

Additions: underlined

Deletions: crossed out

Policy GAT2: Safeguarding Land

“Safeguarding for a second runway

The Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide-spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport.

Small scale development within this area, such as residential extensions, will normally be acceptable. In addition, access/highway infrastructure associated with the Gatwick Green allocation will be acceptable within the Safeguarded Land between the allocation and the M23 spur road, provided it can be designed in a way that is compatible with the expansion of the airport to accommodate highway infrastructure associated with the construction of an additional wide-spaced runway. The airport operator will be consulted on all planning applications within the safeguarded area.

Planning applications for noise sensitive development will be considered on the basis of Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan and in the Local Plan Noise Annex.”

Reasoned Justification

....

“10.21 The Gatwick Airport Master Plan requests that local planning authorities use the revised safeguarding boundary shown in the Master Plan. The council has considered the Airport Layout: Additional Runway shown in Plan 20 of the Master Plan and has included within the Local Plan safeguarded boundary land that would be required to accommodate a southern runway, including the diversion of the A23. However, the Local Plan safeguarded boundary has not included all the land east of the Balcombe Road which is shown in the Master Plan as being utilised for a large area of surface car parking. Given the constrained land supply within the borough and its significant employment and housing needs, the council does not consider surface parking to represent an efficient use of land. The Airport is already accommodating parking more efficiently through decked and robotic parking, and its Surface Access Strategy seeks to reduce access to the airport by car. This area excluded from safeguarding is essential to meet Crawley’s employment floorspace needs and is allocated in Policy EC1 as a Strategic Employment Location. Access to the Strategic Employment Location from Balcombe Road and a road to serve the Gatwick Green allocation can be accommodated in the Safeguarded Land between the allocation and the M23 spur road, in a manner that is compatible with the future provision of highway

infrastructure associated with an additional wide-spaced runway: Policy GAT2 provides for this arrangement.”

Crawley 2040

Draft Crawley Borough Local Plan 2023 – 2040

June 2023

Regulation 19 Consultation
Representation on behalf of
Gatwick Green Limited



GatwickGreen

WHERE THE FUTURE WORKS

Employment Land Trajectory

June 2023



Crawley Local Plan

<p>Ref No:</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 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:	Gatwick Green Limited	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 type="checkbox"/> | No <input checked="" 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.

Please see attached response

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 Employment Land Trajectory (ELT) is an important part of the Local Plan that sets out profile of the supply of land for employment purposes and related parameters. In the context of the proposed allocation of Gatwick Green, GGL is seeking some important changes to the text and the tables in the ELT to robustly reflect the evidence provide by GGL on the scale of market demand for future industrial and logistics development to 2040, the gross site area of Gatwick Green and the appropriate and nominal floorspace provision for the site. These changes are required in order to make the ELT sound in accordance with the need for a local plan to be positively prepared (NPPF, para 35). They will also ensure consistency with other polices and provisions in the Local Plan, in accordance with GGL's proposed soundness amendments to Strategic Policies EC1 and EC4. It is therefore considered that the representation raises important and significant soundness matters relating to the scale of development to be recorded for Gatwick Green in the ELT, which justify the attendance of GGL at the Hearings.

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

20/06/2023

**Draft Crawley Borough Local Plan 2024 - 2040
May 2023**

Regulation 19 Consultation

Representation on behalf of Gatwick Green Limited

Employment Land Trajectory

June 2023



1.0 Introduction

- 1.1 This representation is submitted on behalf of Gatwick Green Limited (GGL). For clarification, Gatwick Green Limited is a wholly owned subsidiary of the The Wilky Group (TWG), which has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. Previous representations were submitted by TWG, but the land is now vested in Gatwick Green Limited. The representation relates to the Employment Land Trajectory (ELT) in the Draft Crawley Borough Local Plan, 2031 (DCBLP).
- 1.2 GGL owns about 48 ha (119 acres) of land east of Gatwick Airport. The plan at **Appendix 1** shows the extent of GGL's land and the proposed allocation of Gatwick Green. The land has been promoted by TWG/GGL as a strategic employment opportunity known as Gatwick Green, most of which forms a proposed allocation as a Strategic Employment Location (SEL) of 44 ha (108.7 acres) (the Site) under Strategic Policy EC4 in the DCBLP. The proposed allocation is for a comprehensive industrial-led development of predominantly storage and distribution uses under use class B8.
- 1.3 The ELT is based largely on evidence contained in the Council's Employment Land Availability Assessment (ELAA¹) and is reflected Topic Paper 5 (Employment Needs and Land Supply²). This representation cross-refers to these documents.

Executive Summary

- 1.4 Gatwick Green is suitable, available, viable and therefore deliverable. GGL has unencumbered ownership of all the land within the allocation area . GGL also has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure the Site can be developed in a sustainable and comprehensive manner. The Council's viability assessment and Savills' review demonstrate that development as envisaged in DCBLP policy is viable and deliverable. GGL is therefore able to deliver the development of Gatwick Green.
- 1.5 The ELT contains a number of elements relating to Gatwick Green that need to be amended in order for it to be sound against the tests in the National Planning Policy Framework (NPPF, 2021). These elements relate to (1) the amount of employment land and floorspace attributed to the Site, and (2) the approach to the amount of development attributed to the Site and its expression as a 'minimum'. GGL's

¹ Employment Land Availability Assessment, Crawley Borough Council, 31 March 2023 (Base Date 31 March 2023)

² Crawley Borough Local Plan Topic Paper 5: Employment Needs and Land Supply, Crawley Borough Council, May 2023

representation on Strategic Policy EC1 sets out robust evidence based on the Economic Growth Assessment (EGA), Topic Paper 5, and Savills' report³ on the market demand for Industrial and Logistics (I&L) in Crawley which concludes that the level of need is about 69 ha, which equates to an outstanding need for about 59.8 ha. The ELT needs to reflect this level of need in relation to Gatwick Green.

Key Considerations for the ELT

1.6 This representation will provide evidence to demonstrate that Gatwick Green can be delivered over the period of the DCBLP. It will therefore address the key headings in the ELT and respond to each of these with regard to the revised / updated evidence attached to GGL's representations on Strategic Policies EC1 and EC4, and based on the relevant policies contained in the DCBLP:

- Suitability of the site for employment development.
- Availability of the site for employment development over the early part of the DCBLP period.
- Achievability of development over the early part of the DCBLP period.
- The viability of delivering employment on the Site.
- The scale of employment development identified for the Site.
- The time-frame for the delivery of employment development identified for the Site.

1.7 In the context of the urgent need to plan and provide for the unmet and long-standing employment and economic needs of the Borough – significantly in the context of the COVID-19 pandemic – and the removal of safeguarding of the Site, evidence is put forward to demonstrate that Gatwick Green is viable and deliverable.

2.0 Policy tests

2.1 Planning Practice Guidance (PPG) requires that sites that are put forward for development in Local Plans must be suitable, available and achievable for economic development over the plan period. The assessment should identify the sites and broad locations with potential for development, assess their development potential and then assess their suitability for development and the likelihood of development coming forward (their availability and achievability) (Paragraph: 001 Reference ID: 3-001-20190722). These tests are addressed below.

³ Strategic Industrial & Logistics – Market-demand forecast for Crawley, Savills, June 2023

Suitability

- 2.2 Gatwick Green is a highly suitable site for strategic employment. In view of its close proximity and accessibility to the M23 and Gatwick Airport, it is well suited to bringing forward a high-quality logistics hub to optimise the potential of this strategic and sustainable location at the confluence of several national transport infrastructure networks – Gatwick Airport, London-Brighton Mainline Rail, the Gatwick Express service, the M23 motorway and the Crawley-Gatwick-Horley Fastway bus service. A review of the Industrial & Logistics (I&L) market by Savills Economics on behalf of GGL forms Appendix 2 to GGL’s representation on Strategic Policy EC1. It sets out market evidence that supports the Council’s positive economic strategy and the approach to increasing the supply of employment land through the allocation of Gatwick Green. Savills Economics has also undertaken an assessment that shows how Gatwick Green is complementary to the key Main Employment Areas in Crawley and the planned Horley Business Park north of the M23 spur road in Reigate and Banstead Borough (Appendix 4 to GGL’s representation on Strategic Policy EC1).
- 2.3 The Savills review identified a series of trends and structural changes in the economy that are driving growth in the Industrial and Logistics (I&L) market. The market is growing in the more peripheral parts of the country away from the traditional midlands base and providing a greater diversity, and enhanced quality, of employment opportunities. Against this background, the I&L sector is severely underrepresented in Crawley compared to other markets and areas, and in particular when compared to markets around major airports. In these circumstances, and given the constrained supply of suitable sites for major B8 uses around Crawley, the demand for a high-profile site in Crawley with access to the Strategic Road Network (SRN) is very strong. This market analysis supports the empirical assessment of employment land needs contained in the Council’s Economic Growth Assessment Supplementary Update for Crawley⁴ (EGA SU), Topic Paper 5⁵ and Savills assessment of market demand for strategic I&L uses referenced at para 1.5.
- 2.4 The Site is not affected by any significant environmental, physical or heritage constraints and could be developed within the current / future aircraft noise environment and aerodrome safeguarding requirements relating to the Airport. A number of evidence based reports were prepared to support the allocation of Gatwick Green for strategic employment. The reports formed Appendices to GGL’s representation on Policy EC1 of the DCBLP (2020) (2020 Appendices) and form part of the Council’s evidence base

⁴ North West Sussex, Economic Growth Assessment, Supplementary Update for Crawley, Lichfields, January 2023

⁵ Topic Paper 5, Employment Needs and Land Supply, Crawley Borough Council, ,May 2023

(Consultation appendix 4b: Wilky Group appendices combined). These reports have been supplemented by addenda and fresh evidence to reflect the revised policy framework in the DCBLP and other changes in circumstances since the original appendices were prepared.

2.5 The reports, addenda and evidence conclude that there are no significant impediments to the Site's development, subject to the inclusion of a range of sustainability and mitigation measures to address either policy requirements or site-specific circumstances. The reports/addenda/evidence cover transport, flood risk, surface water drainage, foul drainage and sewage treatment, water supply, utilities, air quality, noise, ground conditions, renewable energy, landscape & visual, heritage, and ecology & hedgerows.

2.6 The reports/addenda/fresh evidence are appended to the representation on behalf of GGL on Strategic Policy EC1 (Appendix 2 and Appendix 4) and Strategic Policy EC4 (Appendix 2 and Appendices A - E of Appendix 3), and comprise:

1. Strategic Industrial and Logistics, Market Demand Forecast for Crawley
2. Strategic Industrial and Logistics – Location and Complementarity
3. Outline Transport and Access Appraisal – evidence by Empiric Partners and Steers Group
4. Addendum: Environmental and Utilities Preliminary Assessment report
5. Preliminary Ecological Appraisal (PEA) report
6. Addendum: Hedgerow Regulations Assessment report
7. Addendum: Landscape Character and Visual Appraisal report
8. Addendum: Heritage Constraints Appraisal report

2.7 The evidence presented by GGL through its various representations demonstrates that Gatwick Green can be designed and developed such that it can be fully compliant with the development control requirements in Strategic Policy EC4 – the key elements of which are:

- Gatwick Green can deliver a highly sustainable pattern of movement and access consistent with guidance in the NPPF and the Council's sustainable transport strategy.
- Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation in accordance with specific policies on flood risk, drainage and sustainability.

- As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications in accordance with Policy IN3 (Supporting High Quality Communications).
 - Evidence contained in appendices to this representation confirm that Gatwick Green can be developed with appropriate avoidance and mitigation measures so as to respect the various environmental values in and around the Site.
 - There is a high level of complementarity between Gatwick Green and other existing and planned strategic employment sites in and near to Crawley.
 - Gatwick Green is viable and deliverable in accordance with the provisions in Strategic Policy EC4.
- 2.8 Gatwick Green is also complementary to Gatwick Airport's growth plans in its Master Plan 2019, including the DCO for the use of the standby runway and the longer term possibility of an additional wide-spaced southern runway. Evidence in this regard is contained in Savills representation on behalf of the GGL on Policy GAT2.
- 2.9 Overall, the site is considered to be highly suitable for strategic employment, supported by evidence from Savills Economics, and other technical reports relating to infrastructure and environmental considerations.

Availability

- 2.10 GGL owns all the land in the proposed to be allocated under Strategic Policy EC4 and as shown on the Local Plan Map. GGL also confirms that the Site is unfettered by any significant encumbrances on title that could affect the comprehensive development of the Site – in this context, the Site could accommodate employment development based on a gross allocation area of 44 ha of land, delivering a net developable area that reflects all the requirements of Strategic Policy EC4 (c - v). The Site can therefore be developed in a comprehensive and phased way, including the provision of enabling infrastructure. GGL's ownership of the whole allocation and land south of the M23 spur road required for access purposes therefore ensures that the Site is available and that in this regard there are no risks to the delivery of development within the early part of the Plan period.
- 2.11 The GGL representation on Policy GAT2 justifies the provision of the northern access road to Gatwick Green within the Safeguard Land south of the M23 spur road – this in turn could also form the part of the future diversion of Balcombe Road in the event that Gatwick Airport decided to develop an additional wide-spaced southern runway. The arrangement offers significant resource and land-efficiency benefits alongside providing part of the future highway infrastructure associated with a future wide-spaced runway. GGL owns all the land within this Safeguarded Land area south of the M23 spur road,

so it is available to GGL to deliver this highway infrastructure in a manner compliant with the future development of an additional runway at Gatwick.

Site capacity

2.12 A Development Framework Plan (DFP) (**Appendix 2**) has been prepared to illustrate the framework within which the Site can deliver an industrial-led development or predominantly B8 storage and distribution uses in accordance with the development management requirements of Strategic Policy EC4. The DFP also shows the Site's ability to incorporate a range of sustainable transport and environmental requirements arising out of national and local planning policy and other statutory requirements. Feasibility work confirms that the DFP could deliver at least 77,800 sqm of floorspace within an overall Site of 44 ha in a sustainable and environmentally acceptable manner. There are therefore no impediments to the Site accommodating employment development within the 44 ha in accordance with the requirements of Strategic Policy EC4 and other policies in the DCBLP.

2.13 The DFP illustrates the framework for an integrated industrial-led development and co-ordinated transport and green infrastructure solution within the overall Site of 44 ha. The Site could therefore include integrated transport, green infrastructure and Sustainable Urban Drainage (SuDS) solutions within the overall 44 ha, along with I&L development. The feasibility work has confirmed that the development would comprise the following:

- Development predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses.
- Ancillary / incidental uses under Use Class E – office, business and services uses.
- Supporting education uses for apprenticeships & staff training.
- An amenity hub to provide support facilities for staff.
- An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain.
- Sustainable mobility at the heart of the concept:
 - Two bus super hubs to facilitate modal switch and a high level of service for users.
 - A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists.
 - Ancillary car parking with Electric Vehicle Charging facilities.

- 2.14 Gatwick Green represents a strategic opportunity to bring forward a highly sustainable strategic mixed-use employment area, offering a unique opportunity to deliver significant benefits to all three of the key components of sustainability noted in the NPPF.
- 2.15 The Site will have a focus on B8 use class floorspace, but will also accommodate some industrial development. This may help the site to come forward more quickly given its wider appeal to a number of different market sectors. Gatwick Green can deliver about 630 construction jobs over 2 years and about 1,500 permanent on-site operation jobs – research by Savills Economics shows that the I&L sector can deliver a variety of high quality employment opportunities given the highly automated and sophisticated nature of new-generation logistics operations, so helping to transform and rebalance the economy of Crawley, to the long-term benefit of the local community.

Viability

- 2.16 The Council's plan-wide viability assessment⁶ has concluded that *“The Gatwick Green site appears to have the potential to support a more certain or stronger viability outcome, with a wide range of our sensitive tests producing RLVs either well in excess of greenfield land values on the established EUV+ basis again, and values representing serviced, ready to develop industrial land (equivalent to PDL values) also potentially supportable.”*
- 2.17 Savills Economics undertook a review of the Council's viability assessment in 2021 (**Appendix 3**) which supports the Council's findings and concludes that *“We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values of circa £250k per gross hectare, which we consider reasonable for high level viability testing. We do note however the upper Greenfield Land Value of £500k per gross hectare is higher than typically applied in Local Plan and CIL viability testing.”*
- 2.18 Based on the development profile noted at paragraph 2.15 above and in accordance with the provision of Strategic Policy EC4 and other policies of the Plan, Gatwick Green represents a viable development opportunity, which will have a positive internal rate of return and benefit from offering a positive economic rate of return.

⁶ Crawley Borough Council Local Plan Review: Whole Plan Policies & CIL Viability Assessment – Final Report Issued March 2021 (DSP19682 – Final v8), DixonSearl Partnership, March 2021

Delivery timeframe

2.19 Gatwick Green could be developed as an industrial-led proposal for predominantly B8 uses that achieves an appropriate build-out rate; can be parcelled up and phased to de-risk delivery; can benefit from agglomeration, and can deliver wider economic benefits. On this basis, it is considered that the market could support a build-out in accordance with that noted in the ELT, i.e. over years 3 - 11 of the Plan and completion in 2035. Evidence by Savills Economics suggests that the market could support the delivery of the Site over this period given the strong and ongoing demand for large logistics and industrial units at Crawley/Gatwick. The DCBLP rightly contains no policy to constrain the timing or phasing of the delivery of the proposal. However, the DCBLP does note at para 9.58 that the Council anticipate that the proposals could be built out over a 7 to 10 year period with completion in 2040. Based on GGL's assessment and advice from Savills, it is considered that the build-out period would be about 8 years, but with completion 5 years earlier than 2040 (i.e. over 2027 to 2035). To reflect the economic evidence, GGL has sought an amendment to para 9.58 of the DCBLP to reflect its position on the timing of the Site's delivery. Evidence put forward by GGL shows that Gatwick Green is available now to meet the shortfall in industrial land .

2.20 Based on current and foreseeable market conditions and occupier demand, GGL anticipates advancing a planning application in 2025, assuming Strategic Policy EC1 and EC4 are confirmed in the adopted DCBLP. Early work has already commenced in this regard in terms of site surveys, which will be updated as necessary alongside other technical investigations: these will inform the preparation of early conceptual plans for public consultation to inform the masterplan required under Strategic Policy EC4.

Conclusions

2.21 In conclusion, Gatwick Green represents a regionally and nationally significant opportunity for a high quality industrial-led development for predominantly storage and distribution uses to address Crawley Borough's growing deficit of employment land for strategic I&L uses as identified in its employment land evidence base. Gatwick Green can therefore be delivered within the Plan period for the following reasons:

- GGL controls all the land within the area allocated for Gatwick Green.
- There is a small part of the site subject to an encumbrance on title – this would not materially affect the development of the site or the delivery of significant amount of employment land.

- Given the significant interest GGL has received from occupiers, investors and funders, it is confident that the proposals can be developed in a sustainable and comprehensive manner, subject to the site being allocated in the DCBLP.
- GGL has sufficient funding and will draw in additional funding via a development agreement / JV so that the finance is in place to ensure the Site can be developed in a sustainable and comprehensive manner.

3.0 The ELT

3.1 The ELT notes the amount of developable land and floorspace the Site is expected to deliver – this being a minimum of 13.73 ha and consequently 41,315 sqm of floorspace. This level of development is not supported by the overall evidence on the need for employment land.

3.2 GGL has set out the robust evidence on the future need for land for I&L uses in its representation on Strategic Policy EC1. The evidence comprises Council's EGA SU, Topic Paper 5 and Savills additional market-informed forecast for I&L floorspace in Crawley, particularly for large to very large units of 100,000 sq.ft to 250,000 sq.ft or more. Collectively, this evidence provides a comprehensive economic evidence base for the DCBLP that is fully compliant with the requirements of the NPPF and PPG. The evidence is in the form of:

- **The EGA SU** – This identifies a baseline level of need based on current metrics that provides a labour demand forecast equating to a future overall land need of 22.9 ha.
- **Topic Paper 5** – This identifies the qualitative evidence based on market evidence that demonstrates that with reference to a range of market evidence from a variety of independent sources, there is significant demand for strategic B8 distribution and warehouse development which is far in excess of the baseline labour demand forecast in the EGA SU.
- **Savills' market demand forecast report** – This report set out the basis of a forward looking market-informed forecast of future need for employment land for strategic I&L uses. This recognises that the market needs of the logistics sector are typically not well reflected in the labour demands forecasts, and that as PPG requires, further market research is required to arrive at a forecast or an assessment of future property market requirements. The Savills overall future need for strategic land for I&L uses is 69 ha, which taking account of the current supply of land, leaves an outstanding need for **59.8 ha**.

3.3 This robust evidence provides a far higher outstanding need for I&L employment land that must be reflected in the ELT if it to represent a sound part of the DCBLP. Based on this evidence, the ELT is **not sound** in accordance with the tests in the NPPF (para 35) for the following reasons:

1. **Not positively prepared** – the outstanding minimum employment land requirement (13.73 ha) and the floorspace capacity assigned to Gatwick Green (41,315 sqm) referenced in the ELT do not represent the objectively assessed need for employment land in Crawley.
2. **Not justified** – the outstanding minimum employment land requirement (13.73 ha) and the floorspace capacity assigned to Gatwick Green (41,315 sqm) referenced in the ELT are not justified by comprehensive or robust evidence as required under PPG.
3. **Not consistent with national policy** – the outstanding minimum employment land requirement (13.73 ha) and the floorspace capacity assigned to Gatwick Green (41,315 sqm) referenced in the ELT are not in accordance with the NPPF or PPG.

3.4 Based on the evidence in this representation, GGL considers that whilst the ELT correctly acknowledges Gatwick Green as a Strategic Employment Location for I&L uses, it is not sound insofar as it does not reflect the higher level of future need for I&L land in the evidence noted above, and contains a floorspace provision for Gatwick Green that is not aligned with the nominal potential of the Site. On this basis, the ELT is **not sound** and to address these issues, the following amendments are required relating to Gatwick Green. These amendments are:

1. Amend the first paragraph of the 'Commentary' column relating to Gatwick Green by deleting the words "of a minimum 13.73 ha" and replace with "comprising 44 ha".
2. Amending the first paragraph of the 'Commentary' column relating to Gatwick Green by deleting "a minimum of 41,325 sqm of floorspace" and replacing with "around 77,800 sqm of floorspace".
3. Amend the 'Commentary' column relating to Gatwick Green by deleting the second paragraph of the 'Commentary'.
4. Amend the two tables by replacing "41,315 sqm" with "77,800 sqm" and "13.73 ha" with "44 ha" and add a footnote to these revised figures to state that "The final developable area and floorspace will be a product of the masterplanning process required under Strategic Policy EC4".

3.5 The above proposed changes are considered essential for the ELT to be found sound in accordance with the NPPF. The reasoned justification for these changes is set out below (same numbering applies):

1. There is no longer any justification for applying a minimum land provision for Gatwick Green given (1) the evidence of a significant level of future I&L employment land of 69 ha, and (2) it is appropriate to identify the size of the Site at 44 ha to reflect its gross site area within which development and all the other land use requirements identified in Strategic Policy EC1 can be accommodated.

2. The floorspace figure of 77,800 sqm of floorspace reflects the nominal capacity of the Site, which has been tested in the Council's traffic model for Crawley, with sensitivity testing on a higher amount of floorspace. The amount of floorspace the Site could accommodate could be higher once further technical work has been undertaken, but 77,800 sqm represents a reasonable minimum that has been tested in transport terms.
 3. The deletion of the second paragraph of the 'Commentary' is necessary because the second paragraph is misleading in that it assumes that the minimum development of 13.73 ha reflects that (1) there may be justification for more I&L development above the minimum provided for, (2) there is a need for comprehensive supporting infrastructure, appropriate landscaping and to protect the amenity of neighbouring uses, and (3) there may be scope for supporting uses catering for the needs of employees. This approach is not sound for the reasons stated above and because all these other uses will be identified in accordance with the requirements of Strategic Policy EC4 and so will be deducted from the Site's gross land area of 44 ha.
 4. The basis for the 44 ha to replace 13.73 ha in the two tables is that this is the Site's gross site area to be offset against the outstanding need for 58.3 ha.
- 3.6 As a consequence of these proposed changes, there is a need to adjust the Council's Employment Land Availability Assessment (ELAA)⁷ to reflect the proposed amendments noted above.

⁷ Employment Land Availability Assessment, Crawley Borough Council, 31 March 2023

Appendix 1

Site Plan



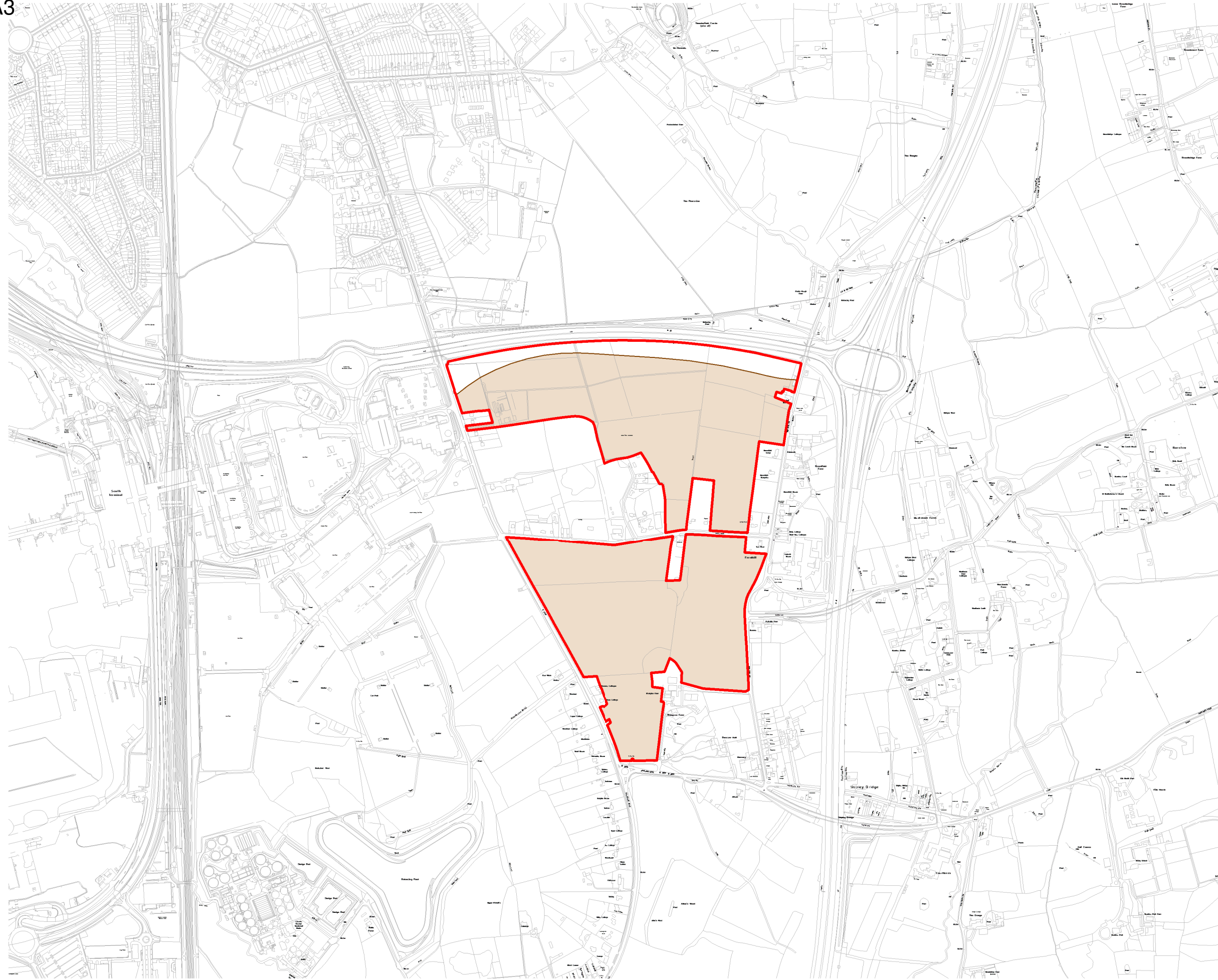
GatwickGreen

WHERE THE FUTURE WORKS

Client
Wilky Group

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Index	Revision	Date	Int	Chkd



LEGEND

- GATWICK GREEN LIMITED OWNED LAND
- PROPOSED STRATEGIC EMPLOYMENT LOCATION UNDER POLICIES EC1 AND EC4



APPROXIMATE NORTH

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Job No / Drg No	Rev	Scale	Status
11/091 / SK-165	-	As indicated	PRELIMINARY
Date	Director	Author	Check
16/06/2023	JA	AH	--

Job
GATWICK GREEN

Drawing
Reg 19 (2023) - Appendix 1 - Site Plan

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes. Reproduced from Ordnance Survey mapping under Licence Numbers 10002432 & 100018493

This drawing may be scaled or cross referenced to the scale bar for Planning Application purposes only. Do not scale for any other purpose, use figured dimensions only. Subject to site survey and all necessary consents. All dimensions to be checked by user and any discrepancies, errors or omissions to be reported to the Architect before work commences. This drawing is to be read in conjunction with all other relevant materials.

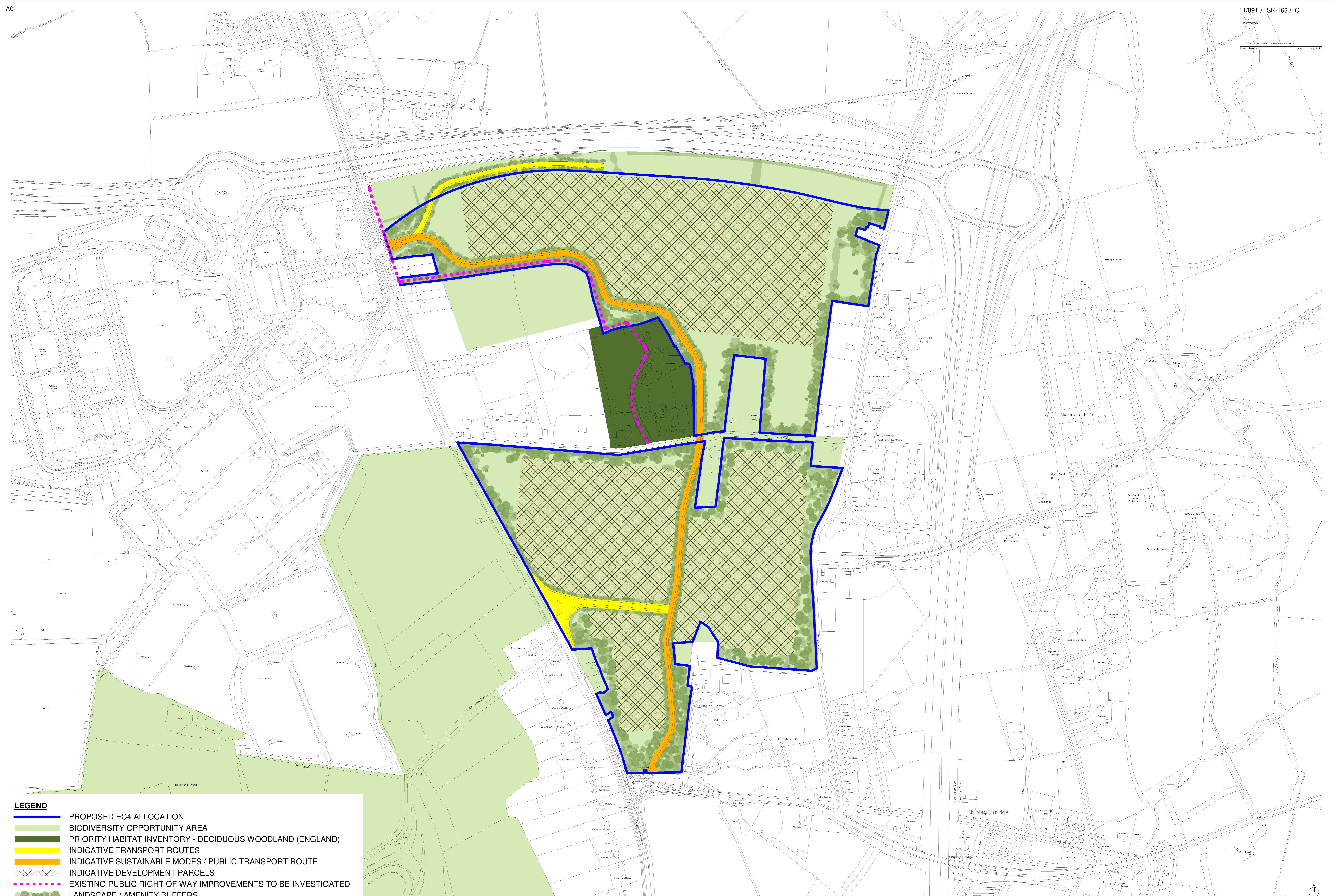
Appendix 2

Development Framework Plan



GatwickGreen

WHERE THE FUTURE WORKS



LEGEND

- PROPOSED EC4 ALLOCATION
- BIODIVERSITY OPPORTUNITY AREA
- PRIORITY HABITAT INVENTORY - DECIDUOUS WOODLAND (ENGLAND)
- INDICATIVE TRANSPORT ROUTES
- INDICATIVE SUSTAINABLE MODES / PUBLIC TRANSPORT ROUTE
- INDICATIVE DEVELOPMENT PARCELS
- EXISTING PUBLIC RIGHT OF WAY IMPROVEMENTS TO BE INVESTIGATED
- LANDSCAPE / AMENITY BUFFERS

GATWICK GREEN

Appendix 3

Gatwick Green Viability Note



GatwickGreen

WHERE THE FUTURE WORKS

Appendix 9 – Gatwick Green Viability Note

Savills Economics

April 2021



1.0 Introduction

- 1.1 This appendix provides Savills review of the Council's viability evidence specific to the proposed Gatwick Green allocation.

2.0 Reader Note

- 2.1 When we refer to the industrial and logistics (I&L) sector we mean Light Industrial (formally B1c use class now part of class E), General Industrial (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require shed-type units (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

3.0 Crawley Viability Evidence

- 3.1 The viability evidence in support of the Submission Version of the Local Plan is detailed in the Local Plan Review: Whole Plan Policies & Community Infrastructure Levy Viability Assessment (March 2021).
- 3.2 We agree with the overall conclusion of the viability evidence that the proposed Gatwick Green allocation is deliverable and generates a Residual Land Value in excess of Greenfield Land Values of circa £250k per gross hectare which we consider reasonable for high level viability testing. We do note however the upper Greenfield Land Value of £500k per gross hectare is higher than typically applied in Local Plan and CIL viability testing.
- 3.3 We agree with the conclusions of paragraphs 3.8.22, 3.11.35 and 4.1.23 that S106 rather than CIL is the more appropriate mechanism for securing enabling infrastructure for strategic development projects such as the proposed Gatwick Green allocation. S106 will ensure critical infrastructure is delivered alongside the development and therefore avoid delays which is common place with the collection and then subsequent spending of CIL receipts.
- 3.4 We broadly agree with the viability assumptions used to test the deliverability of the proposed Gatwick Green allocation and the subsequent sensitivity testing detailed within Table 4i of Appendix IIIb.
- 3.5 In our view I&L yields relevant to the Gatwick Green allocation are likely to be in the range of 4.5% to 5.5% as indicated in paragraph 3.8.21 of the main report. We also consider the £500k per gross hectare for site works and infrastructure costs to be

reasonable for high level viability testing. While this assumption is mentioned in paragraph 2.11.2, for clarity we feel it should be reiterated specific to Gatwick Green in either Appendix 1 or Table 4i of Appendix IIIb.

- 3.6 **Appendix 3 – Industrial & Logistics Land Needs**¹ demonstrates Gatwick Green will experience strong market demand, including for larger units over 100,000 sqft which are currently under-represent in the Crawley market. In this regard the baseline rental assumption of £120 psqm is considered to be at the high end for larger units although we note sensitivity testing goes as low as £100 psqft, which is considered more appropriate as a blended rate should only larger units come forward at Gatwick Green. The counter balance to this is that larger units may have lower build costs to the £826 sqm assumption used which we note does not appear to have been sensitivity tested.

¹ Appendix 3 to the representation by TWG on Strategic Policy EC1

Appendix 3

Fulfilling the development management provisions

3.2 Strategic Policy EC4 also identifies the development management requirements that must be addressed at the planning application stage. This representation refers to a range of technical and environmental reports that provide sufficient policy-level evidence to demonstrate that Gatwick Green can be developed in a manner consistent with Strategic Policy EC4 and other DCBLP policies – the evidence comprises:

- 2020 Appendices¹:
 - Environmental and Utilities Preliminary Assessment
 - Updated Preliminary Ecological Appraisal (PEA)
 - Hedgerow Regulations Assessment
 - Landscape Character and Visual Appraisal
 - Heritage Constraints Appraisal

- 2023 Appendices:

Addendum: Environmental & Utilities Report	Appendix A
Preliminary Ecological Appraisal	Appendix B
Addendum: Hedgerow Regulations Assessment	Appendix C
Addendum: Landscape Character & Visual Appraisal	Appendix D
Addendum: Heritage Constraints Appraisal	Appendix E

3.3 Conceptual site planning for Gatwick Green is still at an early stage; it is anticipated that the development could comprise the following:

- A scheme of predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses.
- Ancillary / associated uses under Use Class E – office, business and services uses.
- Supporting education uses for apprenticeships & staff training.
- An amenity hub to provide support facilities for staff.
- Incidental open spaces for use by the workforce and/or local residents.

¹ Appendices 7 – 12 to the representation by TWG on Policy EC1 of the 2020 DCBLP (dated February/March 2020)

- An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain.
- Sustainable mobility at the heart of the concept:
 - Two bus super hubs to facilitate modal switch and a high level of service for users.
 - A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists.
- Ancillary car parking with Electric Vehicle Charging facilities.

3.4 A Development Framework Plan (DFP) is attached as **Appendix 5** to TWG's representation of Strategic Policy EC4. The DFP provides a high level framework for the future masterplanning of the Site and shows indicative sustainable transport, green infrastructure and various environmental considerations that will influence the nature and extent of development in accordance with the various development management provisions in Strategic Policy EC4. A review of these provisions in the context of related technical and environmental evidence, is set out below which includes some preliminary findings on the types of measures that may be deployed to address the impacts of development at the Site.

Sustainable Design and Construction

3.10 Provisions j to m of Strategic Policy EC4 set out the requirements / guidance with regard to Sustainable Design and Construction for Gatwick Green. These require achieving BREEAM Excellent rating; Net Zero emissions and carbon neutrality by 2050; implementing an energy strategy under Policy SD2, and provision of surface water drainage so as to avoid increasing flood risk.

3.11 The Environmental and Utilities Preliminary Assessment Report (EUPAR)² forms part of the 2020 Appendices and sets out the various design parameters for surface water drainage and flood prevention. The Site is located in Flood Zone 1 and the EUPAR sets out the approach, incorporating Sustainable Urban Drainage Systems (SuDS) and surface water attenuation arrangements that are Airport-compliant. An Addendum to the EUPAR has been prepared by Clarkebond (**Appendix A**), which contains a surface water and flood risk strategy that sets out the core drainage design principles and demonstrates that the various site and local hydrology/hydrogeology considerations can be satisfactorily addressed at the planning application stage.

3.12 Gatwick Green can be developed in a way that achieves sustainable drainage design and construction / operation and in accordance with specific policies in the DCBLP in respect of flood

² DCBLP Evidence Base: Consultation appendix 4b: Wilky Group appendices combined

risk, drainage and sustainability³. These matters will be addressed at the planning application stage and set out in a sustainability assessment and FRA with obligations that can be guaranteed via planning conditions / a s106 agreement.

Digital Technology

3.13 Provision 'n' in Strategic Policy EC4 sets out the requirements / guidance with regard to Digital Technology for Gatwick Green. This requires the provision of high quality communications infrastructure including gigabit-capable full fibre broadband. As a new-generation storage and logistics development, Gatwick Green will incorporate future-proofed digital communications as indicated at Section 5.4.2.2 of the EUPAR and in accordance with Policy IN3 (Supporting High Quality Communications). This requirement will be addressed at the planning application stage and set out in a utilities report with obligations that can be guaranteed via planning conditions / a s106 agreement.

Character and Design

3.14 Provisions o to v of Strategic Policy EC4 set out the requirements / guidance with regard to Character and Design for Gatwick Green. These require that a range of environmental and design / amenity considerations are taken into account in the design and operation of the proposals for the Site. These include:

- A layout and design that respects the interface between the surrounding residences and countryside areas within the North East Crawley Rural Fringe landscape character area.
- A design that is in compliance with the Aerodrome Safeguarding requirements⁴.
- The inclusion of landscape buffers and public open space to address separation of Gatwick Green from Gatwick Airport, Horley and the wider countryside.
- An exemplar standard of flexible design with a high quality public realm.
- The integration of trees, hedgerows and biodiversity into the layout and design and enhance blue/green infrastructure in the context of the Gatwick Woods Biodiversity Opportunity Area.
- Minimising the impacts of lighting on neighbouring residences.
- Respecting the setting of Listed Buildings and Locally Listed Buildings, the integration of 'important' hedgerows and retaining a green buffer along Balcombe Road.

³ DCBLP policies SD1, EP1, EP2, EP3, DD1, DD2, DD5, CL3, CL4, SDC1

⁴ DfT Circular "Control of Development in Airport Public Safety Zones", DfT, March 2010

- 3.15 The environmental considerations relating to hedgerows and ecology, heritage and landscape / visual matters are addressed in the 2020 Appendices and subject to Addenda / a report contained at **Appendices A - E**. These 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.
- 3.16 The specialist reports in the 2020 Appendices and the Addenda / new report at **Appendices A - E** contain a series of conclusions that confirm that the Site can be developed whilst respecting the various environmental values in and around it, and include recommendations on appropriate avoidance and mitigation measures in the context of the specific policies in the DCBLP in respect of environmental protection and enhancement⁵. These matters will be addressed at the planning application stage and set out in a Design and Access Statement.

⁵ DCBLP Policies HA1, HA4, HA5, HA7, OS3, GI1, GI2, GI3, EP4, EP5, EP6, CL6, CL7, DD4

Appendix A - Addendum: Environmental & Utilities Report

Addendum to Environmental and Utilities Preliminary Assessment Report, Clarkebond, 26 February 2020: Surface Water Drainage, Foul Water Drainage and Air Quality

Gatwick Green



B05268-CLK-TN01

22-06-2021

The Wilky Group

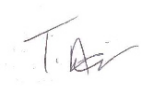

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Technical Note Prepared by:	Approved for Issue by:
Toby Adair Graduate Engineer - Hydrology 	Seymour D'Oyley Associate Director - Hydrology 

Issue No. - Date	Status	Description of Amendments
15-04-2021	P1 - S2 Draft	
18-06-2021	P2 – S2 Final	Include changes from project team feedback.
22-06-2021	P3 – S2 Final	Minor changes from project team feedback

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1 Background

This is an Addendum to the report by Clarkebond entitled ‘Environmental and Utilities Preliminary Assessment Report, Gatwick Green’ dated 26 February 2020 (2020 report) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area – a site known as Gatwick Green.

TWG owns about 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan in **Appendix 1** (Gatwick Green / the Site). The Site is a proposed allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) under Policy EC1 and Policy EC4 for an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green is identified on the plan in **Appendix 1** – it provides for a minimum of 24.1 ha of industrial development.

The 2020 report provided a preliminary assessment of various environmental and infrastructure considerations pertaining to the proposed allocation of the Site for employment purposes. The 2020 report did not cover transport, biodiversity/ecology, heritage and landscape/visual considerations – these topics were addressed in separate reports. This Addendum provides an update to the 2020 report in response to the Site’s proposed allocation for employment development and in respect of certain infrastructure requirements where some additional assessment is needed to confirm the deliverability of Gatwick Green in this regard.

The basis of this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. Consequently, the following sections of 2020 report are no longer valid and are superseded by this report. The table below indicates the sections from the 2020 report that have been superseded and the replacement sections in this report.

Table 1.1.1- Superseded sections of the 2020 report

2020 report sections - superseded	2021 report sections – replacements
1.1 Overview	2 Overview

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1.2 The Proposed Development/Concept	2.1 The Development Concept and the Draft Crawley Borough Council Local Plan
2.0 Site Description and Land Use	2.2 Site Description and Land Use
2.2 Profile of the Proposed Development Concept for Gatwick Green	2.3 Proposed Development Concept for Gatwick Green
3.2 Submission Crawley Local Plan 2020 - 2035 (2019)	2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)

The other sections of the 2020 report remain valid – the data and assessments contained in these sections and related recommendations remain valid and part of TWG’s evidence base and that of the DCBLP.

In addition to the above, this report provides supplementary assessments / information on the following matters:

- Sustainable surface water drainage considerations and opportunities (Sections 3 to 5).
- Consideration of the capacity within the existing foul drainage network and infrastructure (including the Crawley sewage treatment) works to accommodate the current proposal being promoted by TWG with a near-term 2022-26 delivery timeframe (Section 6).
- An update on the Air Quality Assessment in the 2020 report based on the development being promoted by TWG now.

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2 Overview

Gatwick Green is a proposal to develop a sustainable mixed-use development on land east of Gatwick Airport, as proposed by TWG.

2.1 The Development Concept and the Draft Crawley Borough Council Local Plan

The proposed Gatwick Green development is envisaged to be a comprehensive industrial-led development to deliver B8/B2 industrial / logistics / storage uses on land currently allocated for the comprehensive development of an industrial-led Strategic Employment Location in Strategic Policy EC4 – Strategic Employment Location of the latest Draft Crawley Borough Council Local Plan (DCBLP) 2021-2037. The targeted programme is based on a near-term 2022-26 delivery timeframe. **Figure 2.1.1** shows the proposed Development Framework Plan.



Figure 2.1.1: Proposed Development Framework Plan

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2.2 Site Description and Land Use

The Proposed Gatwick Green Site is on predominantly undeveloped Greenfield land, located approximately 800m east of Gatwick Airport and at National Grid Reference (NGR) TQ 29992 41345. The area defined by the red-line plan that represents TWG land is shown in **Figure 2.2.1**, which is different from the red-line site boundary of the development layout in the 2020 report.

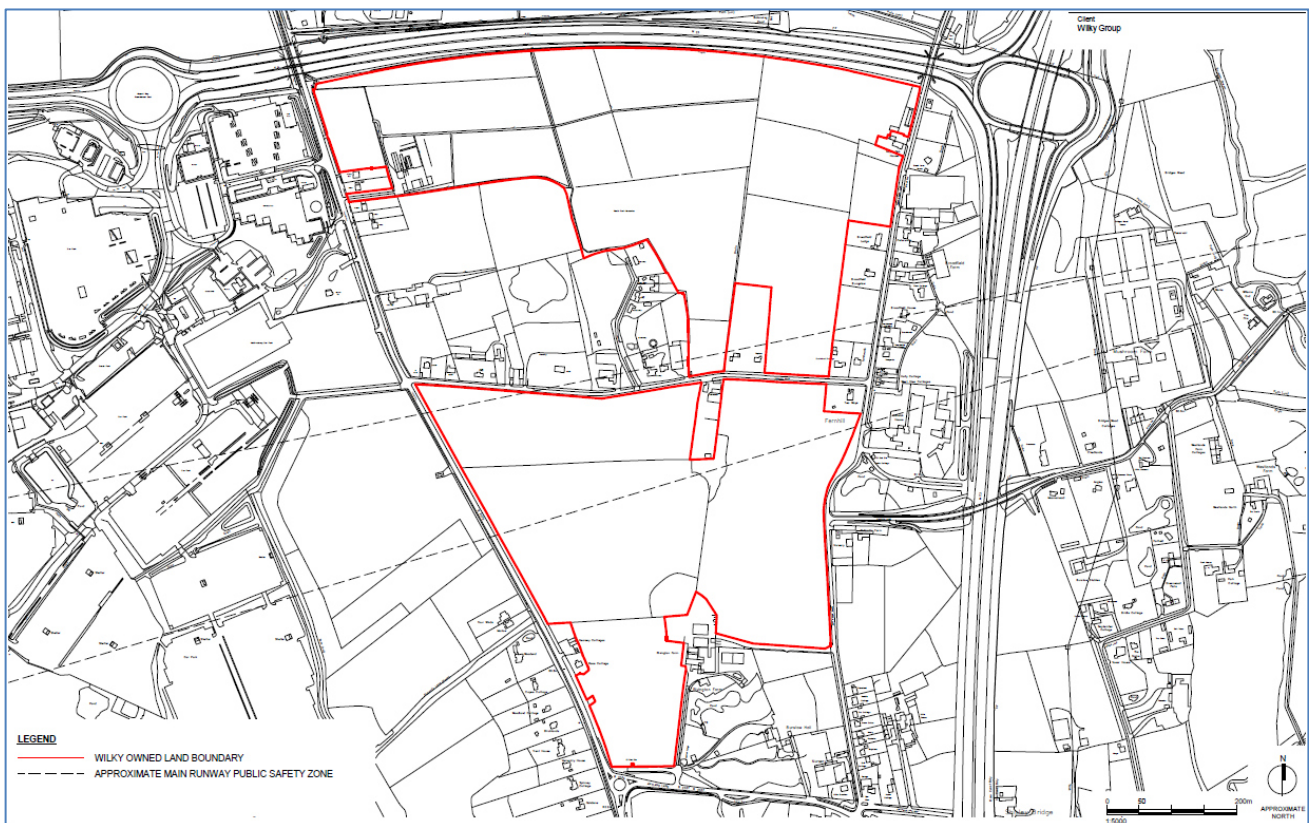


Figure 2.2.1: Red-line Plan Representing TWG land

Most of the Site is bounded to the west by Balcombe Road, beyond which is Gatwick Airport South Terminal Long Stay car park, Gatwick Airport train station and other Gatwick Airport support facilities. Gatwick Airport South Terminal is approximately 1000m west of the Site. The Gatwick Stream is located approximately 800m to the west and the Crawley Sewage Treatment Works is approximately 935m southwest of the southern boundary of the Site.

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The northern boundary is the M23 spur road between junctions 9 and 9a. North of the spur road lies the residential area of Horley, with the Burstow Stream and further Greenfield land located to the north-east. The east of the Site is bounded by Peaks Brook Lane, beyond which are a mix of residences on larger plots and some small businesses. The M23 is approximately 180m to the east, and the south is bounded by further greenfield land. There are listed buildings on the proposed Site as well as in the local surrounding areas.

The town of Crawley is approximately 3.5km south-west of the Site, the town of Horley is approximately 1.7km to the north-west, and the village of Cophthorne is approximately 1.7km to the south-east.

The Site itself is mainly undeveloped agricultural land, which is roughly bisected by a minor road (Fernhill Road) near the centre.

2.3 Proposed Development Concept for Gatwick Green

The development profile is envisaged to comprise:

- A minimum of 24.1 ha of predominantly Use Class B8 with some Use Class B2 – storage and distribution and general industrial uses.
- Ancillary / incidental uses under Use Class E – office, business and services uses.
- Supporting education uses for apprenticeships & staff training.
- An integrated green infrastructure framework – landscape, biodiversity, amenity space to address the objectives of the Biodiversity Opportunity Area and the requirement for Biodiversity Net Gain.
- Sustainable mobility at the heart of the concept:
 - Two bus super hubs to facilitate modal switch and a high level of service for users.
 - A sustainable transport route through the site offering a high level of service for buses (notably the Fastway bus service), pedestrians and cyclists.
- Ancillary car parking with Electric Vehicle Charging facilities.

Refer to Site Plan and Developing Framework Plan in **Appendix 1**.

2.4 Draft Crawley Borough Local Plan 2021 - 2037 (January 2021)

2.4.1 Description of the shift in policy between the 2020 and 2021 Regulation 19 DCBLP

The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over

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the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley’s unmet needs for employment, housing and community uses alongside any legitimate long-term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.

2.4.2 Description of the new policy framework

Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for, such as offices and small-scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 also sets out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery.

These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.

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3 Sustainable Surface Water Drainage Opportunities

3.1.1 Objectives

This additional Section highlights the potential constraints and opportunities which need to be considered in assessing the suitability of the various sustainable drainage system (SuDS) techniques that could be implemented at the Site. It has been undertaken following the approach set out in the relevant standards and guidance (see **Section 3.1.4**) to inform the Development Framework Plan and the conceptual drainage strategy.

3.1.2 Why it is Important to Consider SuDS Early

SuDS are designed to reduce the potential impact of a development with respect to surface water drainage on both the development itself and the wider area. It also provides opportunities to remove pollutants from urban runoff at source, and combines water management with green space, with benefits for amenity, recreation and wildlife.

To fully gain the benefits from a SuDS system it should be considered as early as possible in the design process so that it can be integrated into the master planning for a development to ensure drainage systems are effectively delivered. Consideration of the movement of water and its interaction with space is crucial to the success of SuDS and allows the designer and developer to maximise wider benefits and pre-empt or reduce the issues that could later arise that conflict with the ability of development proposals to incorporate SuDS. Development proposals progressed without undertaking this early stage risk the possibility that the proposed layout would not be capable of being drained in a sustainable way to meet national and local policy.

When designed well, SuDS can increase property value, mitigate local flood risk, moderate microclimate, benefit ecology, provide new sources of water and create valuable amenity spaces for communities to enjoy.

3.1.3 SuDS Policies, Best Practice Standards & Guidance

The Flood and Water Management Act 2010 provides the legislative intention to require all new developments to incorporate SuDS. The National Planning Policy Framework (NPPF) is also a key driver, stating that development should give “priority to the use of sustainable drainage systems”. The NPPF also sets out key priorities for planning to address, including climate change, flood risk, water quality and biodiversity - all challenges that SuDS will help to address.

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Draft Crawley Borough Council Local Plan 2021 – 2037 (January 2021)

The key policies relating to SuDS within the Draft Crawley Borough Council Local Plan are:

Strategic Policy G11: Green Infrastructure

“Large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS and methods that incorporate blue infrastructure into development designs to improve the visual amenity of the development, to account for Policy EP1 and to aid in reducing surface water run-off.”

Policy EP1: Development and Flood Risk

“Development must avoid areas which are exposed to an unacceptable risk from flooding and must not increase the risk of flooding elsewhere. To achieve this, development will demonstrate that peak surface water run-off rates and annual volumes of run-off will be reduced through the effective implementation, use and maintenance of SuDS, unless it can be demonstrated that these are not technically feasible or financially viable.”

Lead Local Flood Authority (LLFA) Guidance

“Water. People. Places – A guide for master planning sustainable drainage into developments”, prepared by AECOM for the Lead Local Flood Authorities of South East of England, complements existing guidance on SuDS design, maintenance and operation which should be used to inform detailed design and delivery of SuDS.

The South East Lead Local Flood Authorities expect this guidance to be used as part of the initial planning and design process for all types of residential, commercial and industrial development. It has been developed through a partnership of South East Authorities and it intends to provide a consistent approach to best practice design of SuDS at the master planning stage. Specific local requirements for SuDS design and adoption may also be set by the Lead Local Flood Authorities.

DEFRA Standards for Sustainable Drainage Systems

This document recommends peak flow and volume control of off-site discharge and the requirements of the drainage system to limit on-site flood risk.

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For previously developed sites, the 1 in 100-year runoff volume should be as close as reasonably practicable to the Greenfield runoff volume for the same event and should never exceed the runoff volume of the site prior to redevelopment nor adversely affect flood risk downstream.

The runoff rates for the 1 in 1 year and 1 in 100-year rainfall events should also be as close as reasonably practicable to the Greenfield runoff rates for the same events and should never exceed the runoff rates of the present land use.

Construction Industry Research and Information Association (CIRIA): The SuDS Manual (C753)

This publication covers the planning, design, construction and maintenance of Sustainable Drainage Systems (SuDS) to assist with their effective implementation within both new and existing developments. It looks at how to maximise amenity and biodiversity benefits, and deliver the key objectives of managing flood risk and water quality. There is also supporting information covering topics such as materials, landscape design, maintenance, community engagement and costs and benefits.

The guidance provides the framework for designing SuDS with confidence and to maximise benefits.

Building Regulations (2010) Hierarchy of Surface Water Discharge

The hierarchy of how surface water disposal should be managed is also discussed in Part H of the Building Regulations (2010) document. It highlights infiltration of surface water to groundwater using soakaways as the most sustainable and preferred drainage strategy. If this isn't feasible then the next consideration should be discharge of water directly into a surface water body, followed by discharge into a surface water sewer/other drainage system and finally discharge into a combined sewer. Where infiltration is not possible it is expected that attenuation techniques are adopted.

3.1.4 SuDS 'Treatment Train'

SuDS are not individual items, but rather an interconnected system where water slowly flows from where it falls to a soakage area or discharge point through a series of features that help to treat, store, re-use, convey and celebrate water. An important concept for the SuDS designer to follow is known as the 'treatment train'. By passing water through several stages of treatment, sediment and other pollutants will be removed more effectively, and maintenance costs are reduced as this minimises the risk of downstream SuDS features

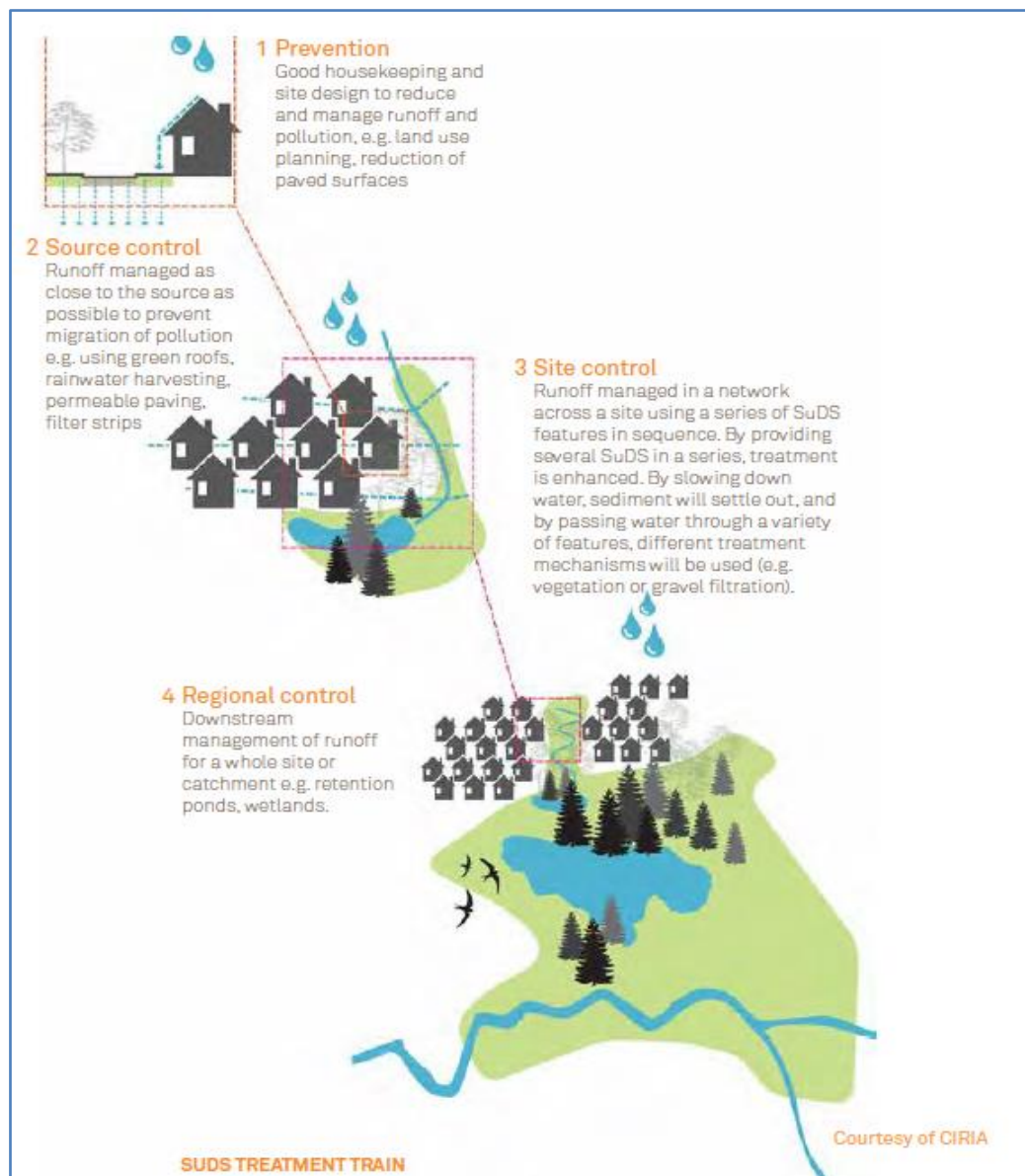
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becoming clogged or blocked. The designer can use the treatment train to create green corridors and links, add opportunities for engagement and education and to match delivery of SuDS to phasing of development.

Figure 3.1.1: The SuDS Treatment Train



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3.1.5 Application of SuDS Guidance to Conceptual Site Development and Drainage Strategy

Both the Site conceptual masterplan and drainage strategy have sought to follow these concepts and standards, considering the site-specific conditions and constraints as outlined in Section 4 and Section 5 of this report.

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4 Assessment of Site Constraints

Refer to the summary of results from the site constraints analysis in **Appendix 2**.

4.1.1 Possible Constraint from the Floodplain of Fluvial & Surface Water Sources

There are no “main rivers” within the Site boundary.

The Site is in Flood Zone 1, which means that the risk of fluvial flooding at the Site is less than a 1 in 1000 year or 0.1% probability each year. This is the lowest classification of flood risk and therefore flooding from fluvial source is not a constraint to development at the Site or to the implementation of SuDS methods. The Environment Agency indicative flood risk map is shown in **Figure 4.1.1**.

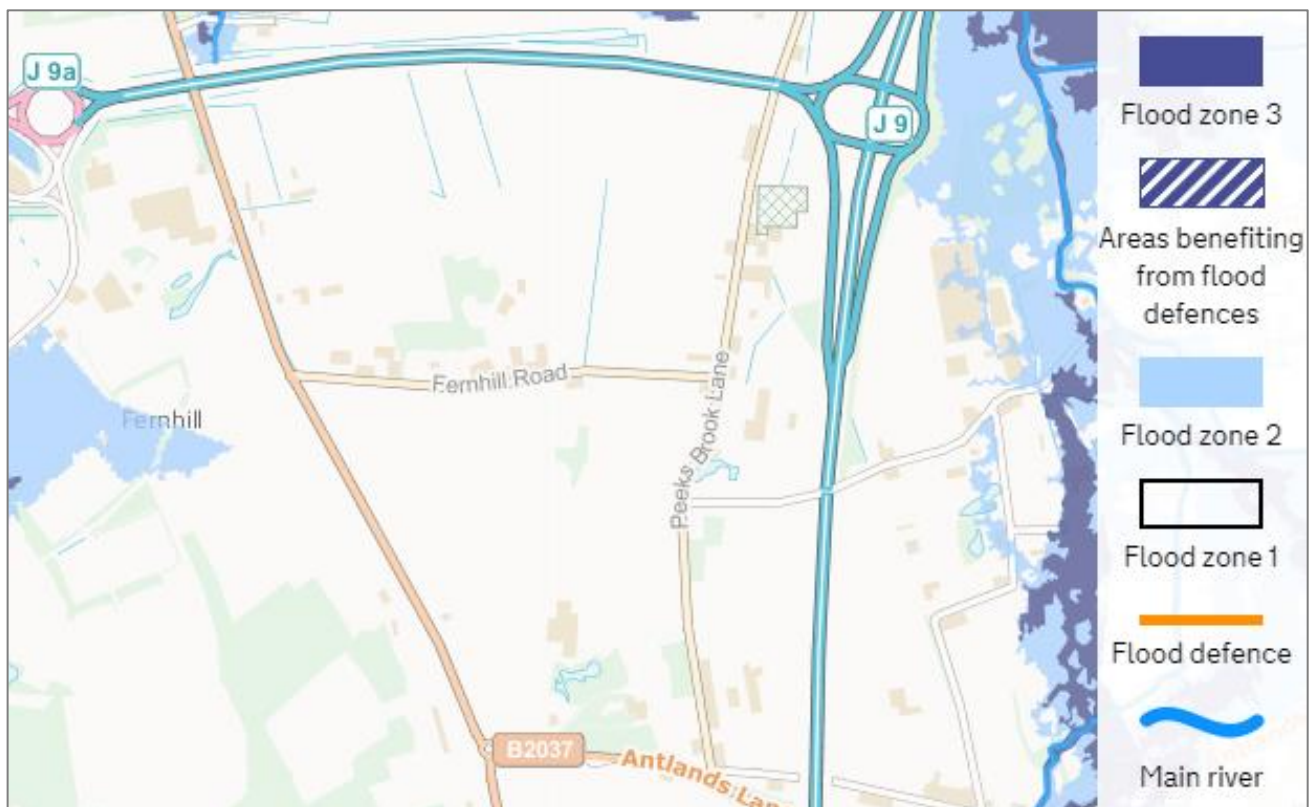


Figure 4.1.1: EA Flood Map for Planning

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As can be seen from the EA surface water flood map (Figure 4.1.2), most of the Site is at very low risk of surface water flooding (i.e., less than 0.1% annual probability of occurrence). There are some pockets of low risk (0.1 – 1% annual probability), medium risk (1 – 3.3% annual probability) and high risk (>3.3% annual probability) on the west and north parts of the site – typically in topographically low areas and along the routes of existing minor ditches and drains.

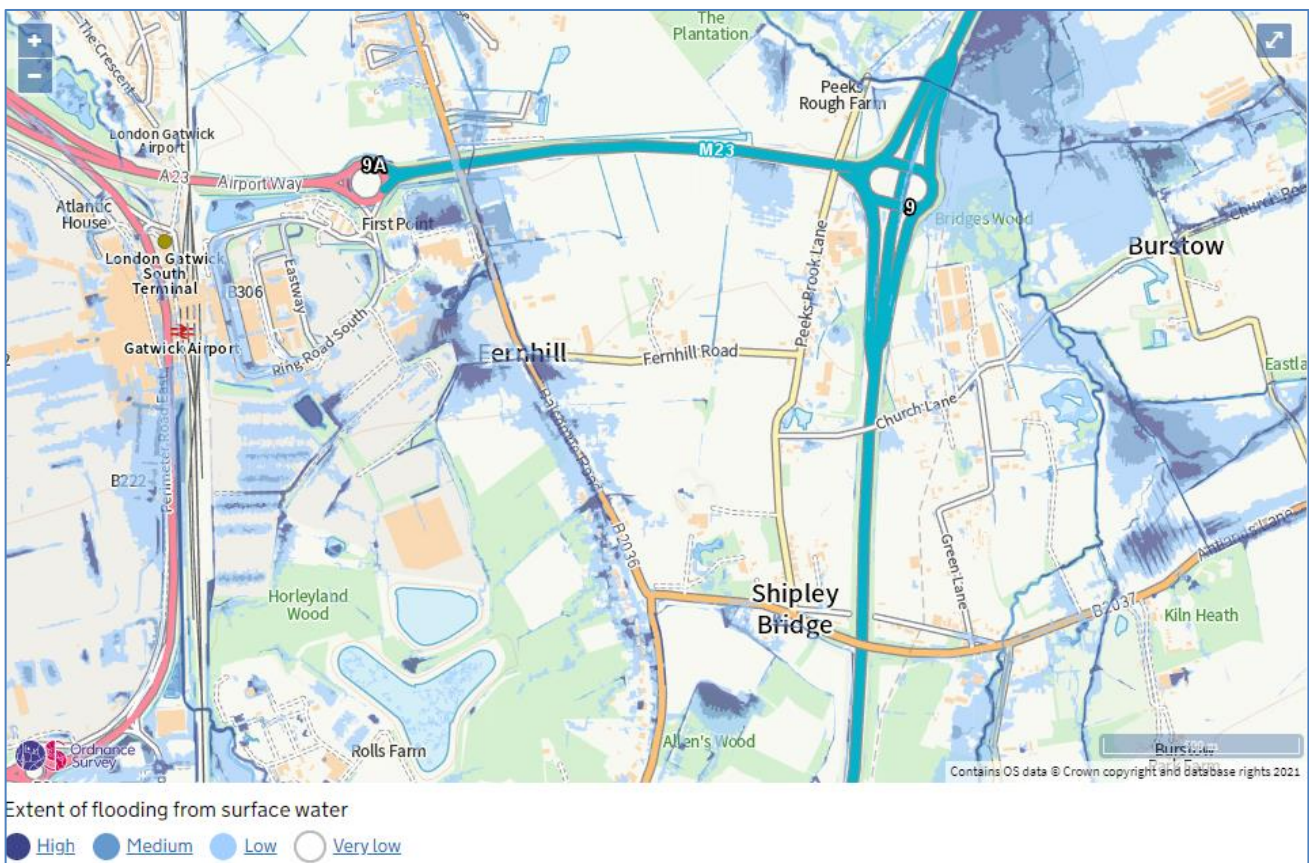


Figure 4.1.2: EA Surface Water Flood Map

The proximity of the Site to Gatwick Airport means that there is a large impermeable surface area just to the west. There is a need for flood risk to be managed at Gatwick Airport particularly in times of heavy rainfall and balancing ponds are used to regulate the rate at which surface runoff is discharged into the River Mole and other watercourses, in accordance with the EA discharge requirements. This does not pose a risk of surface water flooding to Gatwick Green because the drainage catchment area for Gatwick Airport is toward the Gatwick Stream which flows in a north westerly direction away from the Gatwick Green site.

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Based on the above, the floodplains of fluvial and surface water sources do not pose any material restrictions to the implementation of SuDS at the Site.

4.1.2 Possible Constraint from Groundwater

The Site is not within a Groundwater Source Protection Zone (SPZ), and the nearest SPZ is located approximately 8km north. A review of historic borehole data from the BGS website states that groundwater was encountered as seepage at 0.80m depth at the north-west of the Site.

While this does not pose a risk of contamination to important water resources, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential for a high water-table locally in some areas of the Site.

4.1.3 Possible Constraint from Soils & Geology

Infiltration to ground is influenced by the following factors:

- Soil being free-draining and underlying strata having a suitable permeability;
- The presence of important groundwater bodies (receiving water) which are vulnerable to contamination;
- Presence of contaminants on site;
- Availability of adequate land space to satisfy BRE infiltration specification and design requirements.

A review of the Site geology from British Geological Survey (BGS) viewer indicates superficial deposits comprising River Terrace Deposits (undifferentiated) – i.e., sand and gravel underlying the north, east and south-east of the site. The bedrock geology comprises Weald Clay Formation with Mudstone underlying most of the Site, and Weald Clay Formation – i.e., clay-ironstone approximately east-west across the centre of the site.

LandIS ‘Soilscapes’ data indicates that most of the Site falls within ‘Soilscape 22: i.e., loamy soils with naturally high groundwater’. The south-west of the Site is of ‘Soilscape 18: slowly permeable seasonally wet slightly acid but base-rich loamy and clayey soils.’ This is known to have impeded drainage.

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An appraisal of the geology would indicate that the ground conditions at the Site would not be able to facilitate certain types of infiltration drainage methods. However, this will need to be confirmed by BRE Digest 365 Soakaway Tests. This does not rule out the use of infiltration-based SuDS methods with liner and underdrain.

4.1.4 Possible Constraint from Contaminated Land

A Preliminary Risk Assessment was undertaken by Clarkebond for the 2020 report (refer to Section 4.5 – Land Contamination), which identified the following potential sources of contamination at the Site:

- A large above ground oil storage tank was observed to the north of Fernhill Lane. The integrity of the tank is unknown and therefore it may have leaked into the underlying soil. Several other, domestic size oil storage tanks were observed across the site.
- Current land uses of contiguous and surrounding areas include metal merchants and light industrial works. Therefore, there is the potential of hydrocarbon impact from fuel oils/lubricant leakage from these existing land uses.
- It's possible that the Made Ground beneath the site might be contaminated by asbestos and other materials.
- Areas of present and historical land use may have elevated levels of residual pesticides, herbicides and insecticides.

It was assessed that the general risk of significant contamination is low. The potential impact to the local environment should however be assessed in the future by appropriate analysis of the soils and groundwater together with a risk assessment based on the site-specific criteria.

The above assessment does not limit the use of most SuDS methods; however, care will need to be exercised in the consideration of infiltration-based SuDS methods due to the potential low risk of contamination.

4.1.5 Possible Constraint from Surface Runoff Features and Requirements

There are minor watercourses and drains within the Site boundary which eventually discharge into the Burstow Stream north of the M23 spur road. It is therefore feasible for surface runoff from the proposed development to be discharged at controlled rates into these receiving watercourses although some channel improvement works, and upgrades may be required.

Discharge Requirements

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In accordance with the NPPF and DEFRA guidance, development on existing Greenfield sites should restrict runoff to Greenfield rates to ensure the increased impermeable area as a result of development mitigates any impact on the downstream drainage network.

The Draft Local Plan also requires the demonstration that peak surface water run-off rates and annual volumes of run-off will be reduced through the effective implementation, use and maintenance of SuDS.

The above conclusions do not limit the use of most SuDS methods at the Site, and it is recommended that the proposed drainage strategy restricts runoff post-development to current greenfield rates.

4.1.6 Possible Constraint from Site Topography

Topographic data was obtained from the LiDAR composite Digital Terrain Model (DTM), produced by the Environment Agency at a spatial resolution of 1m.

The lowest ground levels are in the north-west adjacent to Balcombe Road, at approximately 57.1m AOD. The highest level is at the south-east at approximately 61.5m AOD. From the contours shown, natural gradients range from mild slopes to relatively flat areas. The topography also indicates that levels generally decrease towards the 'main rivers' north-west and north-east of the M23 spur road – both tributaries of the Burstow Stream. This also indicates the general direction of flow which surface runoff may take.

The topographic review indicates that there is enough land gradient and depth of ground cover to suggest that drainage via gravity is achievable.

4.1.7 Possible Constraint (Easement/Buffer Requirements etc.) from Existing Infrastructure

Foul and Surface Water Sewers

Asset records show that there are no existing surface water sewers on the Site. There are 2 separate public foul sewers on Peeks Brook Lane, which cross the Site and connect to the pump station located adjacent to the eastern boundary. The pump station discharges foul sewage, via a rising main, to the south western corner, near Rose Cottage. There will be easements for the sewers and rising main subject to confirmation with Thames Water.

Power

The closest UK Power Networks grid substation (275kV to 132kV) is in Smallfield, 3km north-east of the Site. The HV cables from Smallfield run to the north of the Site boundary.

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Multiple 33kV primary distribution cable routes cross the Site boundary in the north. 11kV underground and over-ground cables also cross the Site and are assumed to supply 4 HV'LV substations, where a low voltage (LV) network serves local properties via underground and over-ground service lines. LV underground cables and overhead lines are also present within the Site boundary.

Any required excavation work would need to be away from installation, plant and cable routes to avoid damage. Easement and buffer areas will need to be confirmed with the power network provider, but these are not determined to pose any material constraints to the choice of SuDS methods that can be applied at the Site.

Gas Network

Southern Gas Networks (SGN) owns and operates the gas main network in the area of the site. An 18" medium pressure main runs to the west and south of the Site. This is a significant piece of infrastructure which SuDS should avoid. A 125mm low pressure main is located along the existing east-west road that crosses the Site. Because these utilities are beneath a public highway, they are unlikely to be directly affected by the proposed development. Therefore, the local gas network should not affect the choice of SuDS at the Site.

Water Supply

Distribution mains border the Site to the west and the east, running parallel with the B2036 and Peaks Brook Lane respectively, as well as along Fernhill Road. Multiple distribution mains extend away from the Site in the south-west, as well as west towards Gatwick Airport and North towards Horley.

In conclusion the location of these utilities will not pose a material constraint to the use of most types of SuDS due to the availability of space that can be utilised.

4.1.8 Space Constraints

SuDS are often associated with large green spaces; however, there are a range of SuDS features which can be easily designed into tight urban settings. Design forethought is required to build SuDS into multi-functional spaces (such as incorporating them in as part of the public open space requirement) and build up a network of SuDS that manage runoff close to its source to avoid the need for large storage areas.

The space available does not limit the types of SuDS that can be used. 'Land-hungry' SuDS methods are also feasible at the Site. Similarly, space efficient SuDS, such as green roofs, lined permeable paving, rills, rainwater harvesting, hardscape storage are equally viable.



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However, the proximity of Gatwick Airport and the associated flight paths limit the use of large areas of open water such as ponds and wet drainage basins as they can attract birds and pose a risk to aircraft through bird strikes. These types of SuDS features should therefore be avoided at the Site.

4.1.9 Possible Constraint from Protective Species or Habitat

According to Defra’s ‘Magic Maps’, the Site does not fall within an area designated as a protective habitat, including any grassland, heathland, inland rock, wetland or woodland. Therefore, this does not pose a constraint to the use of SuDS.

The area falls within an area outlined as ‘Priority Species for CS Targeting – Brown hairstreak (butterfly) and lapwing (bird)’. Although it does not fall within a protected area for any bird, mammal or plant species. Therefore, it is assessed that protective species and habitats will not pose a constraint to any SuDS considered for the Site.

4.1.10 Possible Ownership & Maintenance Constraint

Adoption discussions should be held early in the design process to ensure that SuDS are designed to the standards required by the adoption authority. Depending on the local provisions and context, the adopter could be the SuDS Approval Body (SAB) under the Flood and Water Management Act, a local authority, a highways authority, a landowner or a water company. Where adoption is uncertain, it is beneficial to ensure that design accommodates flexibility and favours simple solutions with low maintenance needs.

SuDS features can be designed for adoption, ownership and maintenance therefore, this does not act as a constraint to the use of SuDS at the site.

4.1.11 Recommended Sustainable Drainage Principles & Masterplan Considerations

Based on the constraints identified, it is recommended to discharge surface water runoff by gravity to the local watercourses on and near the Site at a controlled greenfield runoff rate as the preferred strategy.

There are additional “source and site control” SuDS measures that are recommended as suitable given the constraints identified and the land space available. Warehousing typically present a low pollutant hazard and

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uncontaminated runoff can then be directed to the local watercourses or infiltrate in a greenfield area. Key impermeable surfaces that will generate runoff should be distributed around the site.

4.1.12 Additional Sustainable Drainage Principles

The following additional techniques can also be considered if viable:

Source control

- Green roofs & rainwater harvesting are both suitable for the large warehouse roofs
- Landscaping (trees and planters) & bioretention areas could be utilised around the perimeter of the Site, which along with the green roof will promote integration of the development with its greenfield surroundings.
- Underground storage, which can store filtered water from a bioretention area for redistribution around the Site.

Site control

- Lined permeable paving where HGVs access is not required.
- Filter strips and swales which can be utilised around the perimeter of the Site to filter runoff and intercept potential runoff from off-site.

Planters, wet woodlands, and trees can be an effective method of water storage and would provide amenity value and there is space available for landscaping within the Site layout.

The use of surface water attenuation ponds & open wetlands is unlikely to be acceptable due to the risk of birds-strike at Gatwick Airport. Therefore, these types of SuDS are not proposed.

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5 Drainage Design Principles and Parameters

5.1.1 Design Considerations and Requirements

The drainage design principles and parameters proposed in this report for the proposed development follow the concepts, considerations and constraints from **Section 4**.

Greenfield Run-off rates

Gross site area measures 47ha. Using micro-drainage and based upon FSR rainfall data, the greenfield run-off rates are calculated as follows:

Table 5.1.1- Summary of Greenfield Runoff Rates Calculated

Return Period (years)	1-year	QBAR	30-year	100-year	100 year + 40%
Greenfield Runoff (l/s)	216.6	254.9	577.6	813.0	1138.2

Qbar discharge rate equates to 5.4 l/sec/Ha.

Refer to green-field run-off calculation in **Appendix 3**.

For the purposes of testing the ability of the site to be drained through a SuDS system, the site has been divided into notional plots as a basis for testing a high-level scenario; these are as follows:

Table 5.1.2- Site Area Broken Down by Plots

Plot Numbers (North of Fernhill Road)	A	B	C		
Areas (Ha)	2.93	8.40	4.48	-	-

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Plot Numbers (South of Fernhill Road)	-	-	-	D	E
Areas (Ha)	-	-	-	5.69	6.73

Total Area 28.23 Ha

Based upon the total area of 28.23 Ha and discharge rate being restricted to Qbar, the total discharge rate for the plot areas is 152.4 l/sec, and total volume of storage required is 27200m³.

For those plots North of Fernhill Road

The Sub-Total Area 15.81 Ha

Combined discharge rate 85.4 l/sec

Approximate volume of attenuation required 15300m³

For plots South of Fernhill Road

Sub-Total Area 12.42 Ha

Combined discharge rate 67.0 l/sec

Approximate volume of attenuation required 11900m³

If on plot attenuation is taken forward the discharge rates and volumes would be as follows:

Table 5.1.3- Summary of Key Drainage Design Parameters by Plot

Plots	Areas (Ha)	Greenfield Discharge Rates (l/s)	Storage Volume Requirement (m³)
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Site A	2.93	15.9	2840
Site B	8.40	45.4	8110
Site C	4.48	24.2	4320
Site D	5.69	30.8	5500
Site E	6.73	36.3	6430

5.1.2 Principles of Land Drainage Proposal

It is proposed to re-profile the existing ditch to the point of the existing culvert crossing. An ecological survey will be required to ascertain if any wildlife will be affected by the reprofiling. It is also proposed to extend the existing ditch located in the middle of the Site (north side of Fernhill road) so that it crosses Fernhill Road. The route of the proposed onsite access road will provide the optimal route for this extended ditch, which will assist with the proposed surface water drainage for plots D & E.

There will be a requirement to get approvals for any changes to the existing ditches, which will require Land Drainage Consents (LDC).

5.1.3 Proposed Drainage Attenuation

Based upon micro-drainage quick storage estimates (QSE) and incorporating flood studies report rainfall data, the storage requirement for the whole Site will be 27,200m³.

Refer to QSE calculations in **Appendix 3**.

The proposed attenuation and water treatment can be provided by the following methods:

Tanked permeable pavement



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Note because of the land uses being put forward, there will be a requirement to improve the water quality prior to discharging from the Site. The option of using tanked permeable paving will provide means of attenuating the hard-standing run-off as well as providing a means of improving the water quality. Tanked permeable pavement negates the requirement for full retention interceptors.

Dry Swales

Due to proximity of Gatwick Airport and the risk bird strike the methods of open storage need to be considered carefully. Dry swales could be effective if they are located close to existing/proposed tree lines. The swales will provide a means of attenuation and improving water quality. The extent of the use of swales will need to be further assessed when more details of the Proposal are known.

Dry Basin

Based upon the proximity of Gatwick airport and the issue of bird strike, this option is not considered viable.

Cellular Tanks

Use of cellular tanks provide another means of attenuation. Cellular storage can provide up to 95% by void ratio as a means of attenuation.

Oversized pipework/culverts

There may be a requirement to provide this, though this is to be reviewed at as part of the planning stage.

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6 Foul Drainage Considerations

6.1.1 Position Statement on Foul Drainage in DCBLP

Thames Water are supportive of growth within the LPA boundary based on Policy IN1 and paragraph 8.10 of the Draft Local Plan, but consider that there should be specific mention in the Policy of wastewater/sewerage infrastructure to ensure that growth is aligned with delivery of additional capacity at Crawley wastewater treatment works. Please refer to Clarkebond's letter and pre-planning enquiry application, and the response from Thames Water (**Appendix 4**).

TWG Ltd fully recognise that water and wastewater infrastructure is essential to any development and that failure to ensure that any required upgrades to the infrastructure network are delivered alongside development, could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and watercourses and/or low water pressure.

Under the Water Industry Act 1991 (amended by the Water Industry Act 1999), developers have an automatic right to connect to the sewer network, but it is generally acknowledged that Thames Water cannot reserve capacity for a particular development in advance; although based on our combined experience and knowledge we understand that it is very rare that sufficient capacity is not available, as regular adjustments are made to existing plant.

6.1.2 Consultation with Thames Water

In order to ensure delivery of the planned growth in the Local Plan and the longer lead-in times that improvements to the sewerage and water network assets for the planning and delivery of any upgrade require, Thames Water encourage developers to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements.

Clarkebond has therefore consulted with Thames Water on behalf of TWG in March and April 2021 about the availability of foul drainage capacity at the Gatwick Green site in Crawley, West Sussex.

Please refer to Clarkebond's letter and pre-planning enquiry application, and the response from Thames Water (**Appendix 4**).

6.1.3 Foul Drainage Implications for Gatwick Green

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Thames Water indicated in their response that as proposed, the minimal discharge from industrial, logistics, storage units domestic load, would not be of concern, as the minimal flow would not be a problem to their sewer network or treatment capacity. Thames water further indicated that should the proposals progress in line with the details provided, they would confirm that there will be enough sewerage capacity in the adjacent foul water sewer network to serve the development.

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7 Air Quality Update

7.1.1 Further Air Quality Considerations from Initial investigations

Initial air quality analysis and investigations for the latest conceptual development proposed by TWG at Gatwick Green indicate that the air quality impacts of HGVs on Balcombe Road will require further investigation to be undertaken at the planning application stage. It is however believed that these impacts can be satisfactorily addressed with a range of potential mitigation measures. This detailed air quality assessment would normally be submitted as part of the planning application.

7.1.2 Possible Way Forward

The approach for Gatwick Green would likely be consistent with the emerging approach that is being trialled by existing businesses and operators in the local industrial environment. Hauliers, online and food retailers, delivery companies and even Royal Mail are trialling and actively implementing the use of delivery vehicles which run on hydrogen gas or electricity. Amazon has started a rollout of electric delivery vehicles this year and UPS, DHL and FedEx have all started to change the ways in which their vehicle fleet is powered. There is also the proposed hydrogen dump at Manor Royal which MetroBus will be making available to 3rd parties. These innovations in approach to sustainability also present an opportunity for Gatwick Green to manage air quality emissions going forward.

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8 Conclusions

The topics outlined and examined within this Addendum indicate that there are no significant and preventable constraints to the development.

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Appendix 1

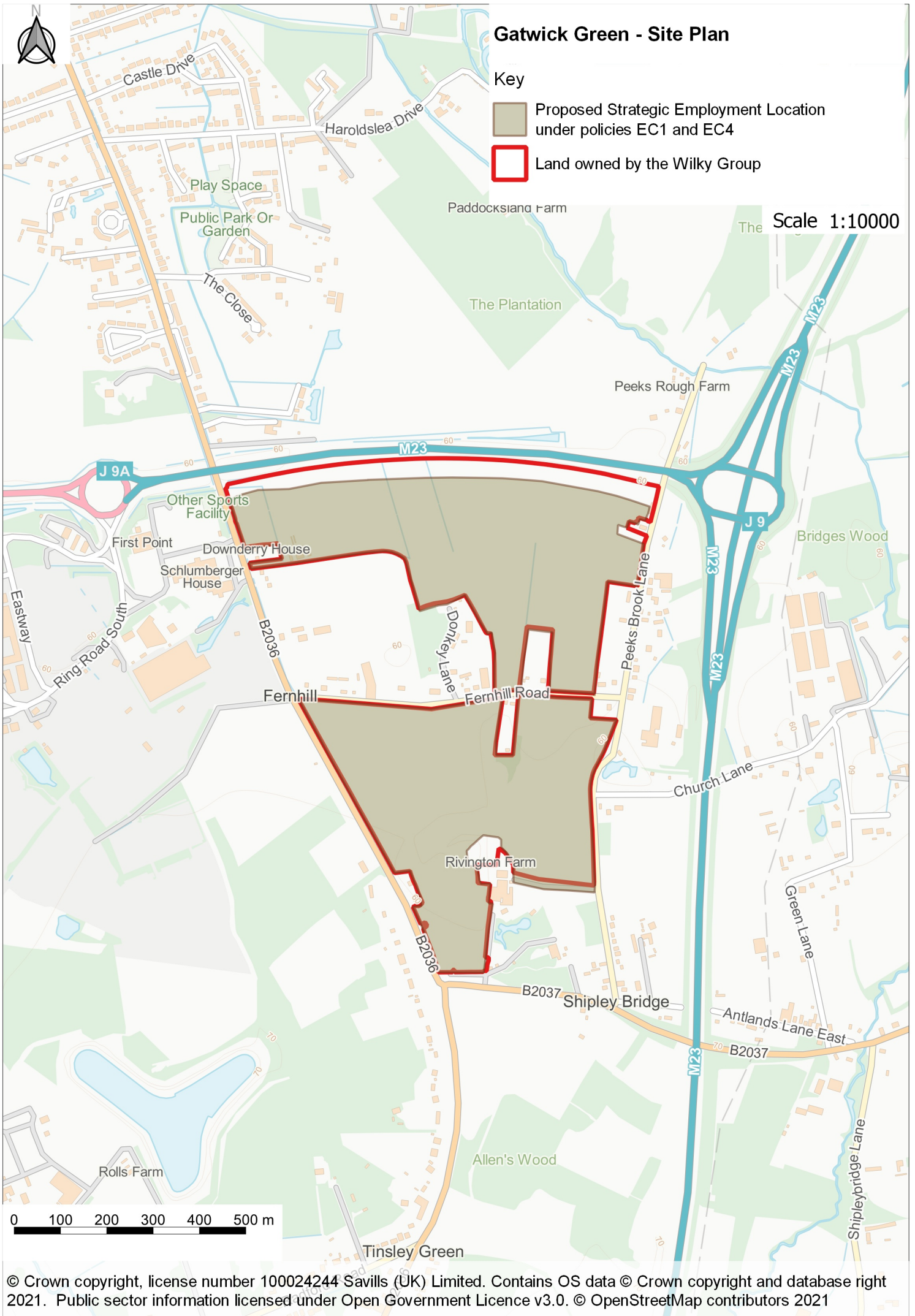


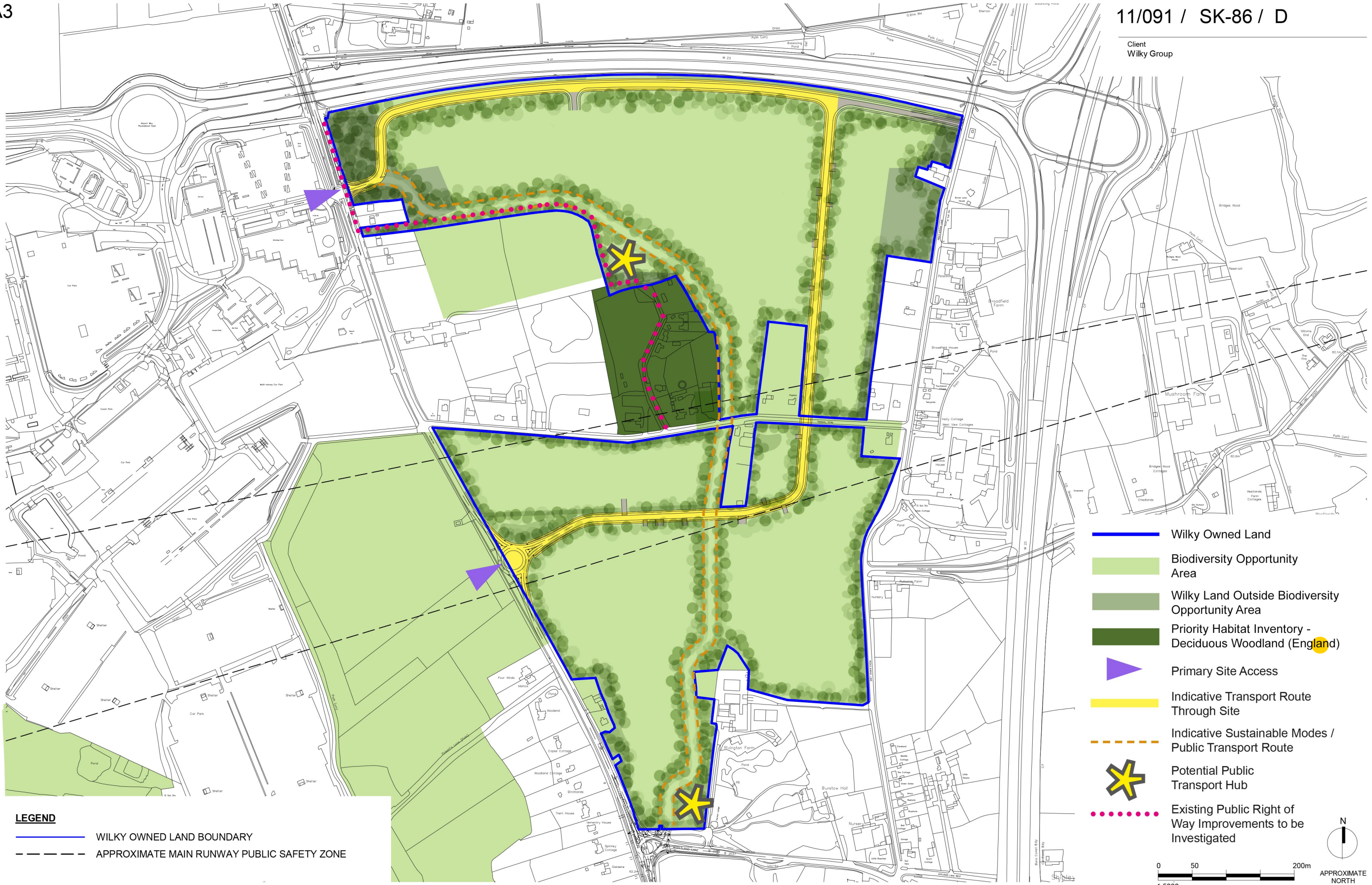
Gatwick Green - Site Plan

Key

-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group

Scale 1:10000





LEGEND

- WILKY OWNED LAND BOUNDARY
- - - APPROXIMATE MAIN RUNWAY PUBLIC SAFETY ZONE

- Wilky Owned Land
- Biodiversity Opportunity Area
- Wilky Land Outside Biodiversity Opportunity Area
- Priority Habitat Inventory - Deciduous Woodland (England)
- ▲ Primary Site Access
- Indicative Transport Route Through Site
- - - Indicative Sustainable Modes / Public Transport Route
- ★ Potential Public Transport Hub
- Existing Public Right of Way Improvements to be Investigated



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Nero Brewery, Cricket Green, Hartley Wintney, Hants RG27 8QA
tel: 01252 844144 www.lsharchitects.co.uk

Job N Drg N 11/091 / SK-86	Rev D	Scale 1 : 5000	Status WORK IN PROGRESS
Date 19/02/2021	Director JA	Author AH	Check JA

Job
GATWICK GREEN

Drawing
Development Framework Plan (2021)

NOTE: All figures are approximate and have been measured and expressed in a manner as defined by the current edition of the RICS Code of Measuring Practice, unless otherwise stated. Figures relate to the current stage of the project and any development decisions to be made on the basis of this information should include due allowance for the increases and decreases inherent in the design and building processes. Reproduced from Ordnance Survey mapping under Licence Numbers 10002432 & 10016463

This drawing may be scaled or cross referenced to the scale bar for Planning Application purposes only. Do not scale for any other purpose, use figured dimensions only. Subject to site survey and all necessary consents. All dimensions to be checked by user and any discrepancies, errors or omissions to be reported to the Architect before work commences. This drawing is to be read in conjunction with all other relevant materials.

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Appendix 2

Summary of Results from Site Constraints Analysis

Suitable 		Green Roof	Rainwater Harvesting	Soakaway	Permeable Paving	Filter Strip	Bioretention Area	Swale	Hardscape Storage	Underground Storage
Floodplain	Located in the Floodplain?									
Groundwater	Groundwater less than 3 metres below ground surface?				 With liner and underdrain (no treatment)	 With liner and underdrain (no treatment)	 With liner and underdrain (no treatment)	 With liner	 If aboveground	 In some areas
Topography	Sited on a flat site (<5% gradient)	 Source Control	 Source Control	 Source Control	 Source Control	 Source Control	 With short Kerb or rill length	 Careful to provide some gradient	 If terraced	
Soils and Geology	Impermeable soil type (e.g. clay-based type)				 With underdrain (no treatment)					
Contaminated Land	Are there contaminated soils on site?				 With underdrain (no treatment)	 With liner	 With liner and underdrain	 With liner	 With Liner	 With Liner
Existing Infrastructure	Are there underground utilities in the SuDS area?						 Possible with structural grid in soil over utilities			
Space Constraints	Limited space for SuDS components?									
Runoff Characteristics	Suitable for inclusion in high risk contamination areas?	 Source Control	 Source Control							
Protected Species or Habitat	Proximity to designated sites									

Suitable 		Green Roof	Rainwater Harvesting	Soakaway	Permeable Paving	Filter Strip	Bioretention Area	Swale	Hardscape Storage	Underground Storage
	and priority habitats?									
Ownership and Maintenance	Can the feature be designed for adoption?									

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Appendix 3

Clarke Bond UK Ltd		Page 1
129 Cumberland Road Bristol BS1 6UY	B05268-001 Gatwick Green Greenfield Run-off Rates	
Date 12/04/2021 11:23 File	Designed by DH Checked by	
Micro Drainage	Source Control 2020.1	

ICP SUDS Mean Annual Flood


Input

Return Period (years)	100	Soil	0.450
Area (ha)	47.000	Urban	0.000
SAAR (mm)	838	Region Number	Region 6

Results l/s

QBAR Rural	254.9
QBAR Urban	254.9
Q100 years	813.0
Q1 year	216.6
Q30 years	577.6
Q100 years	813.0

Quick Storage Estimate




Variables

FSR Rainfall	Cv (Summer)	0.750
Return Period (years): 100	Cv (Winter)	0.840
Region: England and Wales	Impemeable Area (ha)	28.230
Map	M5-60 (mm)	20.000
	Ratio R	0.350
	Maximum Allowable Discharge (l/s)	152.4
	Infiltration Coefficient (m/hr)	0.00000
	Safety Factor	2.0
	Climate Change (%)	40

Analyse OK Cancel Help

Quick Storage Estimate



Results

Global Variables require approximate storage of between 19277 m³ and 27126 m³.

These values are estimates only and should not be used for design purposes.

Analyse OK Cancel Help

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Appendix 4

Thames Water
Developer Services
Clearwater Court
Vastern Road
Reading
RG1 8DB

B05268/SD1

12th March 2021

Dear Thames Water,

Re: Thames Water Foul Drainage Capacity/Infrastructure Enquiry, Crawley, West Sussex

Clarkebond (UK) Ltd (CB) has been requested by our client "The Wilky Group Ltd." (TWG) to consult with Thames Water about the availability of foul drainage capacity at their Gatwick Green site in Crawley, West Sussex.

The Gatwick Green Proposal is a mixed-use development to deliver c.178,590sqm of B8/B2 industrial / logistics / storage uses on land currently allocated for the comprehensive development of an industrial-led Strategic Employment Location in Policy EC4 – Strategic Employment Location of the latest Draft Crawley Borough Council Local Plan (CBLP) 2021-2037. The Gatwick Green site is on predominantly undeveloped Greenfield land, located approximately 800m east of Gatwick Airport, West Sussex and at National Grid Reference (NGR) TQ 29992 41345.

We understand that Thames Water are supportive in principle of Policy IN1 and paragraph 8.10 of the Draft Local Plan, but consider that there should be specific mention in the Policy of wastewater/sewerage infrastructure to ensure that growth is aligned with delivery of additional capacity at Crawley wastewater treatment works. We also understand that in order to ensure delivery of the planned growth in the Local Plan and the longer lead-in times that improvements to the sewerage and water network assets for the planning and delivery of any upgrade require, that it is your wish to encourage developers to contact the water/wastewater company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements.

TWG Ltd fully recognise that water and wastewater infrastructure is essential to any development and that failure to ensure that any required upgrades to the infrastructure network are delivered alongside development, could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and watercourses and/or low water pressure. We also understand that upgrades to STWs etc are funded through customers' bills and the 5 yearly Asset Management Plans (AMPs).

Under the Water Industry Act 1991 (amended by the Water Industry Act 1999), developers have an automatic right to connect to the sewer network, but it is generally acknowledged that Thames Water cannot reserve capacity for a particular development in advance; although based on our combined experience and knowledge we understand that it is very rare that sufficient capacity is not available, as regular adjustments are made to existing plant.

The purpose of this letter is therefore to open this early initial dialogue with Thames Water as the wastewater infrastructure provider to confirm the following:

Bristol, Exeter, London

Clarkebond (UK) Limited
Registered in England & Wales No 7775761
Registered Office: 129 Cumberland Road, Bristol BS1 6UY

ISO	Certificate No
9001	228798
14001	228799
19650-2	229766



clarkebond

- Whether there is enough capacity within the existing foul drainage network and infrastructure including the Crawley sewage treatment works to accommodate the above Proposal based on a near-term 2022-26 delivery timeframe, which is our targeted programme.
- Whether Thames Water have planned foul drainage capacity/infrastructure upgrade or new infrastructure investment planned for this area of interest and the delivery timeframe.
- Whether there are any other significant issues, constraints or limiting factors that are currently adversely impacting on the performance and effective delivery of foul drainage in the Crawley Area that will or can impact on our delivery.

We look forward to hearing from you soon on these and any other related matter that you believe we should to be aware of.

Thank you.

Yours faithfully

For and on behalf of Clarkebond (UK) Limited



Seymour D'Oyley

Associate Director (Hydrology & Flood Risk)



Seymour D'Oyley
The Cocoa House
129 Cumberland Road
Bristol
BS1 6UY

DS6082484

06 April 2021

Pre-planning enquiry: Confirmation of sufficient capacity

Dear Seymour

Thank you for providing information on your development: DS6082751 PDEV RH6 9SZ
GATWICK GREEN

We acknowledge the likely split of flow to the 3 connection points proposed, we have 150mm diameter foul gravity networks in this area, and no likely effluent discharge needing a license, the minimal discharge from industrial, logistics, storage units domestic load, would not be of concern to us, as the minimal flow would not be a problem to our sewer network or treatment capacity as proposed.

Just confirming pre-planning enquiry foul water discharge to Thames Water foul water sewer gravity discharge for industrial, logistics, storage units domestic load properties and Surface water not to our sewer.

We have completed the assessment of the foul water flows based on the information submitted in your application with the purpose of assessing sewerage capacity within the existing Thames Water sewer network.

If your proposals progress in line with the details you've provided, we're pleased to confirm that there will be sufficient sewerage capacity in the adjacent **foul water** sewer network to serve your development.

This confirmation is valid for 12 months or for the life of any planning approval that this information is used to support, to a maximum of three years.

You'll need to keep us informed of any changes to your design – for example, an increase in the number or density of homes. Such changes could mean there is no longer sufficient capacity.

Surface Water

In accordance with the Building Act 2000 Clause H3.3, positive connection of surface water to a public sewer will only be consented when it can be demonstrated that the hierarchy of disposal methods have been examined and proven to be impracticable. Before we can consider your surface water needs, you'll need written approval from the lead local flood authority that you have followed the sequential approach to the disposal of surface water and considered all practical means.

The disposal hierarchy being:

1. store rainwater for later use.

2. use infiltration techniques where possible.
3. attenuate rainwater in ponds or open water features for gradual release.
4. attenuate rainwater by storing in tanks or sealed water features for gradual release.
5. discharge rainwater direct to a watercourse.
6. discharge rainwater to a surface water sewer/drain.
7. discharge rainwater to the combined sewer.
8. discharge rainwater to the foul sewer

Where connection to the public sewerage network is still required to manage surface water flows we will accept these flows at a discharge rate in line with CIRIA's best practice guide on SuDS or that stated within the sites planning approval.

If the above surface water hierarchy has been followed and if the flows are restricted then Thames Water would not have any objections to the proposal.

Please see the attached 'Planning your wastewater' leaflet for additional information.

What happens next?

Please make sure you submit your connection application, giving us at least 21 days' notice of the date you wish to make your new connection/s.

If you've any further questions, please contact me on 020 3577 9228.

Yours sincerely

Many Thanks

Kind Regards

Geoff Nokes

Adoption Engineer

Developer Services – Adoptions Engineer, Sewer Adoptions Team

Office: 0800 0093921

geoff.nokes@thameswater.co.uk

Get advice on making your sewer connection correctly at connectright.org.uk Find us online at developers.thameswater.co.uk



clarkebond

MULTIDISCIPLINARY ENGINEERING CONSULTANTS

The Cocoa House
129 Cumberland Road
Bristol
BS1 6UY

tel: +44 (0)117 929 2244

GF Suite
Bickleigh House
Park Five Business Centre
Exeter EX2 7HU

tel: +44 (0)1392 369098

7 Hatchers Mews
Bermondsey Street
London
SE1 3GS

tel: +44(0)20 7939 0959

www.clarkebond.com

Appendix B - Preliminary Ecological Appraisal

GATWICK GREEN, WEST SUSSEX
UPDATED PRELIMINARY ECOLOGICAL
APPRAISAL

A Report to: Savills

Report No: RT-MME-155543-01-Rev B

Date: March 2023



Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
Tel: 01676 525880 Fax: 01676 521400

E-mail: admin@middlemarch-environmental.com Web: www.middlemarch-environmental.com

REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

This study has been undertaken in accordance with British Standard 42020:2013 “Biodiversity, Code of practice for planning and development”.

Report Version	Date	Completed by:	Check and Approved by:
Interim	09/12/2021	Richard Wheat ACIEEM (Principal Consultant) Asija Zeidaks (Ecological Project Officer)	Tom Docker MCIEEM CEcol (Managing Director)
Rev A	23/03/2023	Richard Wheat ACIEEM (Principal Consultant)	Tom Docker MCIEEM CEcol (Managing Director)
Rev B	28/03/2023	Richard Wheat ACIEEM (Principal Consultant)	Tom Docker MCIEEM CEcol (Managing Director)

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management’s Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client’s brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

VALIDITY OF DATA

The findings of this study are valid for a period of 12 months from the date of survey. If works have not commenced by this date, an updated site visit should be carried out by a suitably qualified ecologist to assess any changes in the habitats present on site, and to inform a review of the conclusions and recommendations made.

NON-TECHNICAL SUMMARY

Middlemarch Environmental Ltd was commissioned by Savills to carry out an Update Preliminary Ecological Appraisal at the site of a proposed development at Gatwick Green in Crawley, West Sussex. To fulfil this brief an ecological desk study and a walkover survey (in accordance with Phase 1 Habitat Survey methodology) were undertaken.

The ecological desk study identified no European statutory sites within 5 km of the survey area, no UK statutory sites within 2 km, and five non-statutory sites within 1 km. The site is not located within 10 km of a statutory site designated for bats. 'Gatwick Woods' Biodiversity Opportunity Area was partially located within the development site. The desk study revealed records of protected/notable species within 1 km of the survey area, including bats, terrestrial mammals, birds and herpetofauna.

The key ecological features on or surrounding the site in relation to the future development of the site include the 'Gatwick Woods' Biodiversity Opportunity Area, the areas of woodland, scattered semi-mature to mature trees, the hedgerow network and an area of scrub/grassland mosaic in the northwest of the site. The habitats on site have the potential to support a range of protected/notable species and great crested newt, bats, nesting birds, invertebrates, reptiles badgers, dormice, hedgehog and brown hare all of which are considered to be material considerations for the proposed development.

The site is a proposed allocation in the Draft Crawley Borough Local Plan 2021-2037 (January 2021) for the comprehensive development of an industrial-led Strategic Employment Location, predominantly for B8 storage and distribution uses. It is possible that the proposals could impact on a range of habitats and protected/priority species. In order to ensure compliance with wildlife legislation and relevant planning policy and to secure a net gain for biodiversity overall, the following recommendations are made:

- R1 Habitat Regulations Assessment:** A Habitat Regulations Assessment should be undertaken to assess the potential impacts the proposed development could have on European statutory sites with hydrological or air quality linkages to the site.
- R2 Ecological Surveys:** The Preliminary Ecological Appraisal has highlighted the presence or potential presence of a range of protected and notable species.
- R3 Scheme Design -** The proposed development should be designed in accordance with ecological mitigation hierarchy as set out in the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG).
- R4 Biodiversity Net Gain Strategy** – A Biodiversity Net Gain Strategy should be produced setting out how the proposed development will secure an overall net gain for biodiversity in accordance with the principles of the Environment Act 2021 and Policy ENV2 of the Crawley Borough Local Plan.
- R5 Construction Ecological Management Plan (CEMP)** – A Construction Ecological Management Plan should be produced for the site setting out the safeguards and appropriate working practices that will be employed to minimise adverse effects on biodiversity and ensure compliance with UK Wildlife Legislation.
- R6 Landscape and Ecology Management Plan (LEMP)** – A Landscape and Ecology Management Plan should be produced setting out the detailed establishment and management of all on site compensation and enhancement measures that are included in the Biodiversity Net Gain Strategy.

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1. INTRODUCTION

1.1 PROJECT BACKGROUND

In June 2021, Savills commissioned Middlemarch Environmental Ltd to undertake an Updated Preliminary Ecological Appraisal of the site of a proposed development at Gatwick Green in West Sussex.

Middlemarch Environmental Ltd has previously carried out the following assessments at the site:

- Preliminary Ecological Appraisal (February 2015, Report RT-MME-118885-01);
- Updated Preliminary Ecological Appraisal (February 2020, Report RT-MME-151186-01); and,
- Hedgerow Regulations (1997) Assessment (February 2020, Report RT-MME-151186-02).

Due to the amount of time that has elapsed since the previous assessment was completed, an updated Preliminary Ecological Assessment was required informed by an updated desk study and field survey.

1.2 SITE DESCRIPTION

The site is located to the east of Gatwick Airport, in Crawley, West Sussex, and is centered at National Grid Reference TQ 299 411. The site is low-lying and generally flat in topography, situated on a largely undeveloped greenfield site. It is an irregular shaped parcel of land that measures approximately 48 ha in size.

At the time of the survey, the site comprised multiple fields of improved and semi-improved grassland, which were bound by a network of hedgerows, ditches and trees. Small areas of semi-natural broadleaved woodland and scrub were also present. The site was bisected by Fernhill Road and bordered by the M23 airport spur to the north, Peeks Brook Lane to the east, the B2037 to the south, and the B2036 to the west.

The wider landscape was dominated by further farmland. Gatwick Airport was located to the west, and the urban fringes of Crawley and Horley were located to the south and north respectively.

1.3 PROPOSED DEVELOPMENT

The site is a proposed allocation in the Draft Crawley Borough Local Plan 2021-2037 (January 2021) for the comprehensive development of an industrial-led Strategic Employment Location, predominantly for B8 storage and distribution uses. The current Development Framework Plan (DFP) for the site is plan 11091-SK-86-D_Colour and identifies the site boundary and key transport, landscape and green infrastructure considerations for the site. The conclusions and recommendations in this report are based on this DFP.

2. METHODS

2.1 DESK STUDY

An ecological desk study was undertaken to determine the presence of any designated nature conservation sites and protected species in proximity to the site. This involved contacting appropriate statutory and non-statutory organisations which hold ecological data relating to the survey area. Middlemarch Environmental Ltd then assimilated and reviewed the desk study data provided by these organisations.

The consultees for the desk study were:

- Natural England - MAG/C website for statutory conservation sites;
- Surrey Biodiversity Information Centre; and,
- Sussex Biodiversity Record Centre.

The desk study included a search for:

- Landscape Scale Conservation Initiatives and Biodiversity Opportunity Areas,
- European statutory nature conservation sites in the UK (now referred to as the 'National Site Network') within a 5 km radius of the site (extended to 10 km for any statutory site designated for bats),
- UK statutory sites within a 2 km radius; and,
- Non-statutory sites and protected/notable species records within a 1 km radius.

The data collected from the consultees is discussed in Section 4. In compliance with the terms and conditions relating to its commercial use, the full desk study data is not provided within this report.

The desk study also included a review of relevant local planning policy with regard to biodiversity and nature conservation (see Section 3).

2.2 PHASE 1 HABITAT SURVEY

A field survey was conducted following the Phase 1 Habitat Survey methodology of the Joint Nature Conservation Committee¹ and the Institute of Environmental Assessment². Phase 1 Habitat Survey is a standard technique for classifying and mapping British habitats. The aim is to provide a record of habitats that are present on site. During the survey, a Habitat Condition Assessment was carried out to determine the ecological status of each habitat recorded. The condition assessment was assessed using published criteria in Panks *et al.* (2021)³, the details of which are presented in Appendix B for each habitat recorded.

During the survey, the presence or potential presence of protected species was noted where observed. This included a review of suitable habitat opportunities or field signs of notable species groups (amphibians, bats, birds, terrestrial and aquatic invertebrates, terrestrial and aquatic mammals, plants and reptiles).

The survey was carried out on 21st October 2021 by Indre Barsketyte (Principal Consultant) and Richard Wheat ACIEEM (Principal Consultant). Table 2.1 details the weather conditions at the time of each survey.

Parameter	23/09/2021	21/10/2021
Temperature (°C)	10 °C	12 °C
Cloud (%)	0%	100%
Wind (Beaufort)	F0	F4-5
Precipitation	Nil	Nil

Table 2.1: Weather Conditions During Field Survey

¹ Joint Nature Conservation Committee (2010). *Handbook for Phase 1 Habitat Survey: A technique for environmental audit (reprint)*. Joint Nature Conservation Committee, Peterborough.

² Institute of Environmental Assessment. (1995). *Guidelines for Baseline Ecological Assessment*, Institute of Environmental Assessment. E&FN Spon, An Imprint of Chapman and Hall. London.

³ Panks, S., White, N., Newsome, A., Potter, J., Heyton, M., Mayhew, E., Alvarez, M., Russell, T., Scott, S.J., Heaver, M., Scott, S.H., Treweek, J., Butcher, B. and Stone, D. (2021) *The Biodiversity Metric 3.0 – Auditing and accounting for biodiversity: Technical Supplement*. Natural England.

Field Survey Constraints and Limitations

Access was restricted the southeast of the site which impeded visual inspection of the habitat features. Habitats in these areas were subsequently mapped from suitable vantage points along the boundary fence and supplemented through the use of aerial images (images based on 2021 data). This did not constrain the assignment of habitats on site to Phase 1 habitat types but may have limited evaluation using the condition criteria. Where this occurred, a precautionary assessment was used for any condition criteria that relies on detailed measurements or species composition which could not be realistically measured due to the access restrictions.

2.3 PRELIMINARY EVALUATION

The Preliminary Evaluation is an initial review of the ecological data to determine which features are likely to be a material consideration for the proposed development at the site. A material consideration is an ecological feature that by virtue of its legal status, its inclusion in any national policy or plan, rarity or contribution to local ecological networks, is worthy of further consideration in the planning system. Typical material considerations include statutory or non-statutory nature conservation sites, species protected by law, Habitat and Species or Principal Importance in England, as defined by the Natural Environment and Rural Communities (NERC) Act 2006 or other ecological corridors or biodiversity opportunities areas outlined in local policy.

3. DESK STUDY RESULTS

3.1 LANDSCAPE SCHEMES

The survey area forms a part of the 'Gatwick Woods' Biodiversity Opportunity Area (BOA). BOAs are landscape-scale areas, defined as a mechanism through which the targets of the Sussex Biodiversity Action Plan (BAP) can be achieved. BOA sites in Sussex are defined by Sussex Biodiversity Partnership and are areas of land where it is considered that the greatest opportunities for habitat creation and restoration lie. The sites were allocated based of a review of existing areas of biodiversity value in Sussex, e.g. BAP habitat types and mapped data. BOAs do not represent a constraint to development activities but indicate where there may be opportunities to make positive changes for biodiversity.

The 'Gatwick Woods' BOA covers approximately 133 ha and forms part of the Gatwick Airport landscape. It is recognised as it supports areas of semi-natural and ancient woodland, which includes Horleyland Wood LWS / ASNW (located 630 m west of the site) (see Table 1.1). The Gatwick Woods BOA description notes that it is an area dominated by the Gatwick Airport landscape but contains a small amount of ancient woodland amongst agricultural land where the opportunities for biodiversity gain and landowner liaison are tangible. It goes on to note opportunities, which include woodland management and restoration, education and community engagement, increased site designation, attracting new businesses, ecological networks and visitor facilities.

3.2 NATURE CONSERVATION SITES

There are no European Statutory Nature Conservation Sites within a 5 km radius of the site. However, a review of the Draft Habitat Regulations Screening Assessment of the Crawley Borough Local Plan (Lepus Consulting 2021)⁴ identified seven European Sites with potential hydrological and air quality linkages to the site (as a strategic employment allocation). These are Ashdown Forest Special Area of Conservation (SAC) and Special Protection Area (SPA), Mole Gap to Reigate Escarpment SAC, Arun Valley SPA, SAC and Ramsar site and the Mens SAC.

All remaining statutory and non-statutory nature conservation sites located in proximity to the survey area are summarised in Table 3.1.

Site Name	Designation	Proximity to Survey Area	Description
Non-statutory Sites			
Bridges Wood	pSNCI	290 m east	On the basis of information available at the time, this site has been identified as a potential site of importance as it is considered likely to contain flora or fauna of county or regional importance. However, it has not yet been surveyed to confirm this.
The Roughs	SNCI	370 m north-east	Ancient semi-natural woodland and damp, semi-improved grassland. Selected as ancient semi-natural woodland supporting at least 18 ancient woodland indicator species. Fine-leaved water-dropwort <i>Oenanthe aquatica</i> , a species shown as Locally Rare on the Surrey Rare Plant Register, is present.
Bridges Fields	pSNCI	390 m north-east	On the basis of information available at the time, this site has been identified as a potential site of importance as it is considered likely to contain flora or fauna of county or regional importance. However, it has not yet been surveyed to confirm this.
Horleyland Wood	LWS	630 m west	A Hazel-Oak-Birch ancient woodland, carpeted with Bluebells in spring and Bracken in the summer. Although frequent in West Sussex, this woodland type is virtually confined to Britain, so remaining areas are of considerable importance. The site also includes a relatively recently constructed pond.

Table 3.1: Summary of Nature Conservation Sites (continues)

⁴ Lepus Consulting (2021) Draft Habitat Regulations Assessment of the Crawley Borough Local Plan. Available <https://crawley.gov.uk/sites/default/files/2021-01/Draft%20Habitats%20Regulations%20Assessment%20of%20Crawley%20Local%20Plan%20January%202021.pdf>

Site Name	Designation	Proximity to Survey Area	Description
Kiln Heath	pSNCI	960 m south-east	On the basis of information available at the time, this site has been identified as a potential site of importance as it is considered likely to contain flora or fauna of county or regional importance. However, it has not yet been surveyed to confirm this.
Key: LWS: Local Wildlife Site SNCI: Site of Nature Conservation Importance pSNCI: Potential Site of Nature Conservation Importance			

Table 3.1: Summary of Nature Conservation Sites (continued)

Although no Sites of Special Scientific Interest (SSSIs) are located within a 2 km radius of the survey area, the survey area does fall within a SSSI Impact Risk Zone for Hedgecourt SSSI which is located 4.6 km to the south-east.

3.3 HABITATS

Table 3.2 summarises priority or notable habitats within a 1 km radius of the site.

Site Name	No. of records	Location of nearest record
Ancient Semi-natural Woodland	30	130 m west
Deciduous Woodland	206	Immediately adjacent to the northwest and south-east boundaries of the site
Traditional Orchard	13	Immediately adjacent to the east of the site.
Ponds	40 (approx.)	Immediately adjacent to the western boundary of the site.

Table 3.2: Summary of priority or other notable habitats within 1km of the site

Landcover data for the site and surrounding landscape includes the following broad habitats: Urban, improved grassland, mixed broad-leaved and yew woodland, arable and horticulture, inland water and coniferous woodland.

3.4 PROTECTED / NOTABLE SPECIES

Table 4.2 and the following text provide a summary of protected and notable species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Species of Principal Importance?	Legislation / Conservation Status
Mammals – bats					
Common pipistrelle <i>Pipistrellus pipistrellus</i>	113	2017	260 m south-west	-	ECH 4, WCA 5, WCA 6
Noctule <i>Nyctalus noctula</i>	17	2016	260 m south-west	✓	ECH 4, WCA 5, WCA 6
Pipistrelle <i>Pipistrellus</i> sp.	20	2011	300 m south-west	#	ECH 4, WCA 5, WCA 6
Soprano pipistrelle <i>Pipistrellus pygmaeus</i>	17	2016	300 m south-west	✓	ECH 4, WCA 5, WCA 6
Unidentified bat <i>Chiroptera</i> sp.	19	2016	300 m south-west	#	#
Unidentified myotis <i>Myotis</i> sp.	22	2014	300 m south-west	-	ECH 4, WCA 5, WCA 6
Long-eared bat <i>Plecotus</i> sp.	3	2011	490 m south-west	#	ECH 4, WCA 5, WCA 6
Brandt's bat <i>Myotis brandtii</i>	2	2011	530 m south-west	-	ECH 4, WCA 5, WCA 6
Brown long-eared bat <i>Plecotus auritus</i>	6	2016	570 m south-west	✓	ECH 4, WCA 5, WCA 6

Table 3.3: Summary of Protected/Notable Species Records Within 1 km of Survey Area (continues)

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Species of Principal Importance?	Legislation / Conservation Status
Daubenton's bat <i>Myotis daubentonii</i>	1	2005	630 m south-west	-	ECH 4, WCA 5, WCA 6
Natterer's bat <i>Myotis nattereri</i>	2	2010	910 m south-west	-	ECH 4, WCA 5, WCA 6
Barbastelle bat <i>Barbastella barbastellus</i>	1	2004	Potentially within 1 km*	✓	ECH 2, ECH 4, WCA 5, WCA 6
Whiskered bat <i>Myotis mystacinus</i>	1	1992	Potentially within 1 km*	-	ECH 4, WCA 5, WCA 6
Mammals – other					
Brown hare <i>Lepus europeus</i>	1	2021	10 m south-west	✓	-
Hedgehog <i>Erinaceus europaeus</i>	6	2015	140 m north	✓	WCA 6
Dormouse <i>Muscardinus avellanarius</i>	8	2016	170 m south-west	✓	ECH 4, WCA 5, WCA 6
Amphibians					
Great crested newt <i>Triturus cristatus</i>	50	2019	210 m north-east	✓	ECH 2, ECH 4, WCA 5
Common frog <i>Rana temporaria</i>	28	2017	330 m south-west	-	WCA 5 S9(5)
Common toad <i>Bufo bufo</i>	17	2017	350 m south-west	✓	WCA 5 S9(5)
Palmate newt <i>Lissotriton helveticus</i>	21	2017	360 m west	-	WCA 5 S9(5)
Smooth newt <i>Lissotriton vulgaris</i>	38	2017	360 m west	-	WCA 5 S9(5)
Reptiles					
Grass snake <i>Natrix helvetica</i>	79	2017	310 m south-west	✓	WCA 5 S9(1), WCA 5 S9(5)
Common lizard <i>Zootoca vivipara</i>	1	2006	770 m south-east	✓	WCA 5 S9(1), WCA 5 S9(5)
Slow worm <i>Anguis fragilis</i>	2	2016	780 m south-west	✓	WCA 5 S9(1), WCA 5 S9(5)
Birds					
Barn owl <i>Tyto alba</i>	4	2019	290 m south-west	-	WCA 1i
Kingfisher <i>Alcedo atthis</i>	13	2020	290 m south-west	-	WCA 1i
Hobby <i>Falco subbuteo</i>	4	2017	620 m west	-	WCA1i
Red kite <i>Milvus milvus</i>	4	2019	630 m south-west	-	WCA 1i
Little ringed plover <i>Charadrius dubius</i>	1	2004	660 m south-west	-	WCA 1i
Fish					
Bullhead <i>Cottus gobio</i>	1	2015	990 m south-west	-	ECH 2
Invertebrates					
Brown hairstreak butterfly <i>Thecla betulae</i>	9	2019	270 m south-west	✓	WCA 5 S9(5)
White-letter hairstreak butterfly <i>Satyrion w-album</i>	5	2018	320 m north-west	✓	WCA 5 S9(5)
Jersey tiger moth <i>Euplagia quadripunctaria</i>	1	2015	630 m south-west	-	ECH 2
Plants					
Bluebell <i>Hyacinthoides non-scripta</i>	75	2016	Potentially on site ⁺	-	WCA 8 S13(2)
Pennyroyal <i>Mentha pulegium</i>	3	2010	620 m west	-	WCA 8

Table 3.3 (continued): Summary of Protected/Notable Species Records Within 1 km of Survey Area

Key:

#: Dependent on species.

+: Grid reference provided was six figures and as such, the record may be located within 100 m of the study site.

*: Grid reference provided was four figures only.

ECH 2: Annex II of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest whose conservation requires the designation of Special Areas of Conservation.

ECH 4: Annex IV of the European Communities Council Directive on the Conservation of Natural Habitats and Wild Fauna and Flora. Animal and plant species of community interest in need of strict protection.

WCA 1i: Schedule 1 Part 1 of Wildlife and Countryside Act 1981 (as amended). Birds protected by special penalties at all times.

WCA 5: Schedule 5 of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds).

WCA 5 S9(1): Schedule 5 Section 9(1) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to intentional killing, injury or taking.

WCA 5 S9(5): Schedule 5 Section 9(5) of Wildlife and Countryside Act 1981 (as amended). Protected animals (other than birds). Protection limited to selling, offering for sale, processing or transporting for purpose of sale, or advertising for sale, any live or dead animal, or any part of, or anything derived from, such animal.

WCA 6: Schedule 6 of Wildlife and Countryside Act 1981 (as amended). Animals which may not be killed or taken by certain methods.

WCA 8: Schedule 8 of Wildlife and Countryside Act 1981 (as amended). Protected plants and fungi.

WCA 8 S13(2): Schedule 8 Section 13(2) of Wildlife and Countryside Act 1981 (as amended). Protection limited to selling, offering for sale, possessing or transporting for purpose of sale, or advertising for sale, any live or dead plant, or any part of, or anything derived from, such plant.

Species of Principal Importance: Species of Principal Importance for Nature Conservation in England.

Note. This table does not include reference to the Berne Convention (Convention on the Conservation of European Wildlife and Natural Habitats), the Bonn Convention on the Conservation of Migratory Species of Wild Animals or the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Table 3.3 (continued): Summary of Protected/Notable Species Records Within 1 km of Survey Area

Birds

The desk study provided records of 10 bird species listed as Species of Principal Importance and as Birds of Conservation Concern Red List species, comprising: bullfinch *Pyrrhula pyrrhula*, hawfinch *Coccothraustes coccothraustes*, herring gull *Larus argentatus*, house sparrow *Passer domesticus*, linnet *Linaria cannabina*, marsh tit *Poecile palustris*, skylark *Alauda arvensis*, song thrush *Turdus philomelos*, starling *Sturnus vulgaris* and yellowhammer *Emberiza citrinella*.

The desk study provided records of three further Birds of Conservation Concern Red List species, comprising: grey wagtail *Motacilla cinerea*, mistle thrush *Turdus viscivorus* and nightingale *Luscinia megarhynchos*.

The desk study provided records of 13 additional Birds of Conservation Concern Amber List species, comprising: common gull *Larus canus*, dunnock *Prunella modularis*, house martin *Delichon urbicum*, kestrel *Falco tinnunculus*, lesser black-backed gull *Larus fuscus*, mallard *Anas platyrhynchos*, mute swan *Cygnus olor*, redshank *Tringa tetanus*, redstart *Phoenicurus phoenicurus*, stock dove *Columba oenas*, swift *Apus apus*, tawny owl *Strix aluco* and willow warbler *Phylloscopus trochilus*.

Invertebrates

The desk study provided records of 30 moth species listed as Species of Principal Importance, including lunar yellow underwing *Noctua orbona* for example, which is also included on the Sussex Rare Species Inventory. The desk study provided records of 3 species of butterfly listed as Species of Principal Importance, comprising: dingy skipper *Erynnis tages*, small heath *Coenonympha pamphilus* and white admiral *Limenitis camilla*. In addition, the desk study provided records of long-horned bee *Eucera longicornis* and scarce four-dot pin-palp *Bembidion quadripustulatum*, which are both listed as Species of Principal Importance. Records of numerous other notable and Sussex Rare invertebrates were provided, including Araneae (spiders), Coleoptera (beetles), Diptera (flies), Hemiptera (true bugs), Hymenoptera (ants, bees and wasps), Odonata (dragonflies and damselflies) and Orthoptera (grasshoppers and crickets).

Plants

The desk study provided records of two plant species which are listed as Endangered on the IUCN Red List, comprising hawkweed *Hieracium sabaudum* and eyebright *Euphrasia pseudokernerii* (also a Species of

Principal Importance). Records of two plants listed on the Sussex Rare Species Inventory, comprising floating club-rush *Eleogiton fluitans* and greater burnet-saxifrage *Pimpinella major* were also identified.

3.5 INVASIVE SPECIES

Table 3.4 provides a summary of invasive species records within a 1 km radius of the study area. It should be noted that the absence of records should not be taken as confirmation that a species is absent from the search area.

Species	No. of Records	Most Recent Record	Proximity of Nearest Record to Study Area	Legislation / Conservation Status
Himalayan balsam <i>Impatiens glandulifera</i>	13	2017	Potentially on site*	WCA 9
Least duckweed <i>Lemna minuta</i>	3	2013	Potentially on site*	INNS
Spanish bluebell <i>Hyacinthoides hispanica</i>	2	2005	Potentially on site*	INNS
Cherry laurel <i>Prunus laurocerasus</i>	12	2018	170 m south-west	INNS
Yellow archangel <i>Lamium galeobdolon</i> subsp. <i>argentatum</i>	6	2014	170 m south-west	WCA 9
New Zealand pigmyweed <i>Crassula helmsii</i>	2	2012	430 m south-west	WCA 9
False Virginia creeper <i>Parthenocissus inserta</i>	2	2003	480 m south-west	WCA 9
Rhododendron <i>Rhododendron ponticum</i>	16	2018	480 m south-west	WCA 9
Montbretia <i>Crocsmia x crocosmiiflora</i>	5	2014	530 m east	WCA 9
Cotoneaster <i>Cotoneaster horizontalis</i>	1	1997	720 m east	WCA 9
Japanese rose <i>Rosa rugosa</i>	3	2014	720 m east	WCA 9
Floating pennywort <i>Hydrocotyle ranunculoides</i>	1	2004	740 m east	WCA 9
American skunk-cabbage <i>Lysichiton americanus</i>	1	2004	Potentially within 1 km*	INNS
Nuttall's waterweed <i>Elodea nuttallii</i>	1	2016	Potentially within 1 km*	WCA 9
Himalayan cotoneaster <i>Cotoneaster simonsii</i>	1	2007	Potentially within 1 km**	WCA 9
Hybrid bluebell <i>Hyacinthoides x massartiana</i>	1	2013	Potentially within 1 km**	INNS
Japanese knotweed <i>Fallopia japonica</i>	1	2005	Potentially within 1 km**	WCA 9
Winter heliotrope <i>Petasites fragrans</i>	1	2004	Potentially within 1 km**	INNS
Key: **: Grid reference provided was two figures only.				
WCA9: Schedule 9 of Wildlife and Countryside Act 1981 (as amended). Invasive, non-native, plants and animals.				

Table 3.4: Summary of Invasive Species Records Within 1 km of Survey Area

4. PHASE 1 SURVEY

4.1 INTRODUCTION

An annotated Phase 1 Habitat Survey Drawing (Drawing C155543-01-01) together with detailed descriptions of each habitat is provided in Section 7. The Phase 1 Habitat Survey drawing illustrates the location and extent of all habitat types recorded on site.

4.2 HABITATS

Table 4.1 details the types, extent and ecological condition of the habitats which were recorded on site during the field survey visit.

Habitat	Area (Ha) / Length (Km)	Condition
A1.1.1 Broad-leaved semi-natural woodland	0.80	Moderate
A2.1 Dense scrub	1.56	Good (0.42 ha) Moderate (0.04 ha) Poor (1.11 ha)
A3.1 Trees (Scattered and lines)	0.37 km	Good
B4 Improved grassland	41.37	Moderate
B6 Poor semi-improved grassland	2.48	Poor
J1.3 Ephemeral/short perennial	0.21	Moderate
J3.6 Buildings	0.03	N/A Other
J4 Bare ground	0.35	N/A Other
J5 Other (Grassland/scrub mosaic)	1.40	Moderate
G1.1 Eutrophic standing water (Ditch)	0.4 km	Poor
J2.1.1 Species-rich intact hedgerow	0.60 km	Good (0.44 km) Moderate (0.16 km)
J2.1.2 Species-poor intact hedgerow	0.96 km	Good (0.72 km) Poor (0.24 km)
J2.3.1 Species-rich hedgerow with trees	0.40 km	Good
J2.3.2 Species-poor hedgerow with trees	2.69 km	Good (1.48 km) Moderate (0.98 km) Poor (0.22 km)
J1.4 Ornamental hedge	0.08 km	Poor

Table 4.1: Summary of Habitats Recorded on Site

4.3 FAUNA

Table 4.2 summarises the suitability of the site for protected/notable species and any species/evidence of species that were recorded during the survey. The time of year at which the survey is undertaken will affect species or field signs directly recorded during the survey.

Species/Group	Description
Amphibians	There are no waterbodies within the site, although a network of seasonally wet ditches is present, principally along the hedgerow network. Due to the shading of these ditches, together with the limited aquatic vegetation, amphibian breeding opportunities are considered to be limited. The mature hedgerow network, patches of woodland and scrub/grassland mosaic provide excellent terrestrial habitat for amphibians with good dispersal opportunities throughout the site. Tree roots, woody debris and discarded materials were noted in the scrub/grassland mosaic to the northwest – all of which provide opportunities as refugia/hibernacula.
Bats	The site support numerous semi-mature to mature trees with suitable bat roosting features. These trees are principally associated with mature tree lines and hedgerows with good connectivity throughout the site. Several alternative features such as mature trees were also noted offsite in the surrounding landscape.

Table 4.2: Summary of Species/Species Evidence Recorded on Site

Species/Group	Description
Bats (continued)	The hedgerows, trees and woodlands were all noted to provide excellent foraging/dispersal opportunities for bats across the site. The site is somewhat enclosed to the north and further to the east by the M23 which may act as a barrier to onward dispersal from the site.
Birds	The areas of scrub, woodland, mature trees and hedgerows are all deemed to provide excellent nesting habitat for breeding birds. The large open pasture field may also provide some limited opportunities for ground nesting birds such as skylark, particularly to the north of the site which is outside of the immediately low-flying flight path of the adjacent Gatwick airport. During the visit in late autumn, many of the fields were inundated and so may attract overwintering flocks.
Invertebrates	The majority of the site comprises modified habitats which are intensively managed and provide limited structural or micro-habitat diversity for invertebrates. The exceptions were the semi-mature to mature trees along the hedgerows, which may provide some opportunities for saprophytic species, and the scrub/grassland mosaic with its greater diversity of habitat types and vegetation structure.
Plants	The modified and intensively managed nature of much of the site suggests the site is unlikely to support notable plant species or vegetation communities. The greatest botanical richness was associated with the scrub/grassland mosaic in the north of the site although the density of the sward and extent of scrub encroachment is likely to be restrictive to plant diversity overall.
Reptiles	The scrub/grassland mosaic provides excellent habitat opportunities for reptiles with good structural diversity and micro habitats/refugia provide by discarded waste and materials. The habitat is however rather isolated with intensively managed habitat to the east and south and built development and Balcombe Road to the west restricting dispersal. The embankment along the M23 motorway corridor to the north may provide some limited connectivity to and from the site.
Terrestrial mammals	Brown hare – The open grassland and hedgerow habitats provide some habitat opportunities for brown hare although many of the southern field were shortly grazed and inundated in part which may restrict the suitability of the habitat for this species.
	Badger – The site provides suitable foraging dispersal and sett building opportunities for badger with connectivity to alternative badger habitat to the east, south and west. Dispersal opportunities may also be present along the M23 embankment on the northern boundary and via the M23 underpass along Peeks Brook Lane.
	Dormice - The network of woodland, scrub and mature hedgerow and trees all provide suitable habitat opportunities for dormice with good connectivity to further areas of semi-natural woodland to the south and west. The site is however isolated to the north by the M23 motorway and Balcombe Road and Antlands Lane to the west and south is likely to limit dispersal into the site from the surrounding landscape.
	Harvest Mouse – The hedgerows, species-poor grassland margins and scrub-grassland mosaic in the northwest of the site provide suitable nest building and foraging habitat for harvest mice. The hedgerow network provides good connectivity throughout the site to alternative habitat opportunities to the northwest, along the M23 embankment although surrounding road network may limit onwards dispersal opportunities.
	Hedgehog – The woodland, scrub and hedgerow network provide suitable habitat opportunities for hedgehog. Connectivity throughout the site is largely unimpeded but the M23, Balcombe Road and Antlands Lane to the south may limit dispersal opportunities to and from the site.
Aquatic mammals	Whilst the site supports an extensive ditch network associated with the boundary hedgerows, these features were largely deemed unsuitable for aquatic mammals such as otter and water vole. This is because the majority of the ditches were heavily shaded by adjacent hedgerows, supported little or no aquatic vegetation and/or were seasonally dry.

Table 4.2: Summary of Species/Species Evidence Recorded on Site

4.4 INVASIVE SPECIES

Patches of cotoneaster were observed growing within the central woodland in the southern half of the site. This cotoneaster could not be identified to species level, and therefore it is possible that it might be a hybrid. Many cotoneaster species and their hybrids are considered to be invasive under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended).

5. PRELIMINARY EVALUATION

5.1 LANDSCAPE SCHEMES

Gatwick Woodlands Biodiversity Opportunity Area

The site is situated within Gatwick Woodlands Biodiversity Opportunity (BOA) which is identified on the Crawley Borough Green Infrastructure Supplementary Planning Document. The BOA is subsequently a material consideration for the proposed development.

5.2 NATURE CONSERVATION SITES

European Statutory Sites

In accordance with the Conservation of Habitats and Species Regulations 2017 (As amended) all European Sites have the potential to be a material consideration for a proposed development where there are identified direct or indirect linkages. The Draft Habitat Regulations Assessment for Crawley Borough Council identifies either an air quality or hydrological link between the site and seven European sites. These are Ashdown Forest SAC and SPA), Mole Gap to Reigate Escarpment SAC, Arun Valley SPA, SAC and Ramsar site and the Mens SAC, all of which are subsequently considered as a material consideration for the proposed development.

Hedgecourt SSSI

The site is located c.5 km from Hedgecourt SSSI but is located within its SSSI impact zone. SSSIs are statutory nature conservation sites of national importance and so Hedgecourt SSSI is a material consideration for the proposed development.

Non-Statutory sites

The site is physically separated from all non-statutory sites within 1 km by built development or major transport corridors within no obvious connectivity between the site and features for which the site is notified. Non-statutory wildlife sites are therefore not a material consideration to the proposed development.

5.3 HABITATS

An evaluation of the importance of each habitat recorded on site is summarised in Table 5.1.

Habitat Type	Material Consideration?	Rationale
Broad-leaved semi-natural woodland	Yes	The areas of woodland, whilst peripheral and species-poor, form part of a local network of deciduous woodland in the surrounding landscape. Woodland management and restoration are identified as opportunities for the Gatwick Woodlands BOA.
Scrub	Yes	Whilst scrub is a ubiquitous habitat is nevertheless provides an important ecotone between woodland and grassland habitats and contributes towards the overall habitat structure of the site.
Trees (Scattered and Lines)	Yes	The scattered and linear early-mature to mature trees increase habitat structure and micro-habitat diversity across the site and makes a contribution to woodland canopy cover. Any areas of canopy cover may offer opportunities to support the management and restoration of woodland habitats in the context of the Gatwick Woods BOA.
Improved/ Poor semi-improved grassland	Yes	Whilst the areas of grassland have limited species or structural diversity, they still provide a permeable area for species dispersal and some limited habitat opportunities for more mobile species such as badger. The extent of the grassland is also a notable consideration as it will cumulatively make a significant contribution towards the overall biodiversity value of the site.
Ephemeral/short perennial	No	The ephemeral/short perennial vegetation is limited in extent and lacks structural diversity and so is considered to be of low nature conservation value.
Buildings	No	The buildings do not support features of nature conservation value.
Bare ground	No	The area of bare ground appears to be regularly disturbed and unvegetated and so has no nature conservation value.

Table 5.1 Preliminary Evaluation of Habitats (Continues)

Habitat Type	Material Consideration?	Rationale
Other (Scrub/grassland mosaic)	Yes	The scrub/grassland mosaic does not qualify as a Habitat of Principal Importance (e.g. Open Mosaic on Previously Developed Land) but does have good habitat structure, diversity and ecotones that are likely to support opportunities for a range of species.
Hedgerows (All)	Yes	All hedgerows within the site (with the exception of the ornamental hedgerow in the north of the site) qualify as a Habitat of Principal Importance and a local priority habitat. The hedgerow network makes a significant contribution to habitat diversity and structure in the site and provides a structural network to support species dispersal north-south and east-west of the site. The hedgerow network is also likely to be critically associated with a range of species including amphibians, bats, birds, dormice, and invertebrates.
Standing water (Ditches)	Yes	The ditch network is mainly associated with the hedgerow network and so provides additional structural diversity to these features as well as supporting some limited aquatic habitat for dependent species.

Table 5.1 Preliminary Evaluation of Habitats

All Habitats

All habitats have the capacity to be important in the context of the site as they contribute to the overall biodiversity value of the site when quantified using a biodiversity metric tool. The Biodiversity Metric tool uses habitat attribute data to assign a comparable value of biodiversity using habitat area, quality (distinctiveness) and condition. Therefore, habitats of high quality, those of low quality with a high spatial coverage, can still be of intrinsic important for achieving biodiversity net gain targets irrespective of whether they are a material consideration or not.

5.4 SPECIES

An evaluation of the importance of each habitat recorded on site is summarised in Table 5.1.

Species/Group	Material Consideration?	Rationale
Amphibians	Yes*	The site is within close proximity, or has connectivity to, several offsite ponds and supports suitable terrestrial habitats for amphibians. There are records of five amphibian species within a 1 km radius including great crested net and common toad both of which are Species of Principal Importance. Great Crested Newts afford full protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (As amended).
Bats	Yes*	The site supports numerous bat roosting features and excellent foraging/dispersal routes throughout the site and to the surrounding landscape. There are records of 10 bat species within a 1 km radius of the site with a notable extent of suitable bat roosting/foraging habitat immediately to the south. Several bat species are Species of Principal Importance, and all afford full protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (As amended).
Birds	Yes*	The site supports a range of suitable nesting habitat for breeding birds including opportunities for species such as barn owl (a Schedule 1 bird species) and a range of red and amber list birds of conservation concern, all of which have been recorded within 1 km of the site. All nesting birds afford protection under the Wildlife and Countryside Act 1981 (as amended) whilst in nest.
Invertebrates	Yes	The site provides some limited habitat opportunities for brown hairstreak, dingy skipper and small heath all of which are Species of Principal Importance.
Plants	No	The modified and most intensively managed habitats on site are considered unlikely to support notable plant species or vegetative communities.
Reptiles (Continues)	Yes*	The scrub/grassland mosaic in the northwest of the site provide excellent habitat opportunities for reptiles. There are records of grass snake, common lizard and slow worm within a 1 km radius of the site although connectivity to the northwest of the site for reptiles is limited by transport

Table 5.2 Preliminary Evaluation of Species (Continues)

Species/Group	Material Consideration?	Rationale
Reptiles (Continued)	Yes*	corridors. All reptiles afford limited protection under the Wildlife and Countryside Act 1981 (as amended).
Terrestrial Mammals - Badger	Yes	The site supports suitable habitats for badgers. Whilst there are no records for this species within a 1 km radius, badgers are mobile animals and have the capacity to disperse into the site at any stage. Badgers and their setts are protected under the Protection of Badgers Act 1992.
Terrestrial Mammals – Brown hare	Yes	The site supports some limited habitat opportunities for brown hare and there is a record of brown hare within 10 m of the site. Brown Hare are a Species of Principal Importance.
Terrestrial mammal – Dormice	Yes*	The woodlands and hedgerow network provide potential habitat opportunities for dormice on site with some limited connectivity to alternative habitats with known dormice records in the surrounding landscape. Dormice are a Species of Principal Importance and afford full protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017 (As amended).
Terrestrial Mammals – Harvest mouse	Yes	There are no records of harvest mice within a 1 km radius, however the site supports suitable habitat within the distributional range for this species. Harvest mice are a Species of Principal Importance.
Terrestrial Mammals - Hedgehog	Yes	The site supports suitable habitat opportunities for hedgehog and records of hedgehog are present within a 1 km radius of the site. Hedgehogs are a Species of Principal Importance.
Aquatic Mammals	No	There are no records of aquatic mammals (otter or water vole) within a 1 km radius of the site. The majority of the ditches within the site are of limited value for aquatic mammals due to low foraging potential, shading and/or seasonal water levels and connectivity to the site via adjacent watercourses is poor.
Key * Features assessed as material consideration based on available evidence such as existing records or habitat suitability. Conclusion should be evaluated if and when further information about the status of the species becomes available.		

Table 5.2 Preliminary Evaluation of Species (Continued)

5.5 INVASIVE SPECIES

The patches of cotoneaster, whilst not confirmed, could comprise one of several species listed under Schedule 9 of the Wildlife and Countryside Act 1981 (as amended) which prohibits allowing this species to spread into the wild. As a precautionary approach, all areas of cotoneaster should be considered as a Schedule 9 species and so is a material consideration for the proposed development.

6. RECOMMENDATIONS

All recommendations provided in this section are based on Middlemarch Environmental Ltd's current understanding of the site proposals in the Development Framework Plan (DFP) - 11091_SK-86-D_Colour by Lyons Sleeman Hoare, correct at the time the report was compiled. Should the proposals alter, the conclusions and recommendations made in the report should be reviewed to ensure that they remain appropriate.

- R1 Habitat Regulations Assessment:** A Habitat Regulations Assessment should be undertaken at the planning application stage to assess the potential impacts the proposed development could have on European statutory sites with hydrological or air quality linkages to the site.
- R2 Ecological Surveys:** The Preliminary Ecological Appraisal has highlighted the presence or potential presence of a range of protected and notable species. The following surveys are recommended at the planning application stage to help inform the potential impacts on, and opportunities for, protected and notable species at the site.
- Great Crested Newts,
 - Bats,
 - Birds,
 - Reptiles,
 - Badgers; and,
 - Dormice.
- R3 Scheme Design -** The proposed development should be designed in accordance with ecological mitigation hierarchy as set out in the National Planning Policy Framework (NPPF), and the National Planning Practice Guidance (NPPG). The mitigation hierarchy requires all development schemes to apply to following principles:
- **Avoidance** – the proposed development should seek to avoid/minimise losses of semi-natural habitats such as the existing areas of woodland, the hedgerow network, scattered mature trees and the scrub/grassland mosaic, in the first instance and incorporate these features in the landscaping layout of the scheme accordingly. This will help to further avoid and minimise impacts to protected and notable species.
 - **Mitigation** – where significant harm cannot be wholly or partially avoided, adverse should be minimised by design or through the use of effective mitigation measures such as minimising light spill or providing replacement foraging/dispersal routes for species.
 - **Compensation** – where unavoidable losses occur and mitigation cannot be provided, compensation for significant residual harm will be required as a last resort or planning permission could be refused. Compensation should include the creation of new habitats of ecological value (taking into account local nature conservation targets or the existing Gatwick Woodlands BOA) and providing novel compensation solutions to minimise effects on protected or notable species to ensure compliance with UK wildlife legislation.
- R4 Biodiversity Net Gain Strategy** – A Biodiversity Net Gain Strategy should be produced setting out how the proposed development will secure an overall net gain for biodiversity in accordance with the principles of the Environment Act 2021 and Policy ENV2 of the Crawley Borough Local Plan. Biodiversity Net Gain is planning process that aims to leave biodiversity on site in a better state than it was before; going beyond solely avoiding, mitigating and compensating adverse effect on biodiversity and actively seeking to enhance the site's biodiversity value overall. The Biodiversity Net Gain Strategy should set out all habitat and species enhancement measures that will be designed and delivered as part of the development scheme and maintained over a 30-year period. Where this is not achievable on site, offsite measures may be required to cater for any shortfalls as part of a Biodiversity Offset scheme.

The Biodiversity Net Gain Strategy should be informed by the use of a Biodiversity Metric tool to help guide and quantify the baseline and proposed value of the scheme.

R5 Construction Ecological Management Plan (CEMP) – A Construction Ecological Management Plan should be produced for the site setting out the safeguards and appropriate working practices that will be employed to minimise adverse effects on biodiversity and ensure compliance with UK Wildlife Legislation. The details of the CEMP will be informed by the final site design and ongoing ecological survey works but should include as a minimum:

- Development standoffs and safeguards for all retained habitats,
- Construction timetables to avoid sensitive periods such as nesting bird season
- Vegetation management measures to minimise the risk to protected or notable species
- Compliance with any specific mitigation measures that will be required to acquire a Development Licence for works affecting protected species

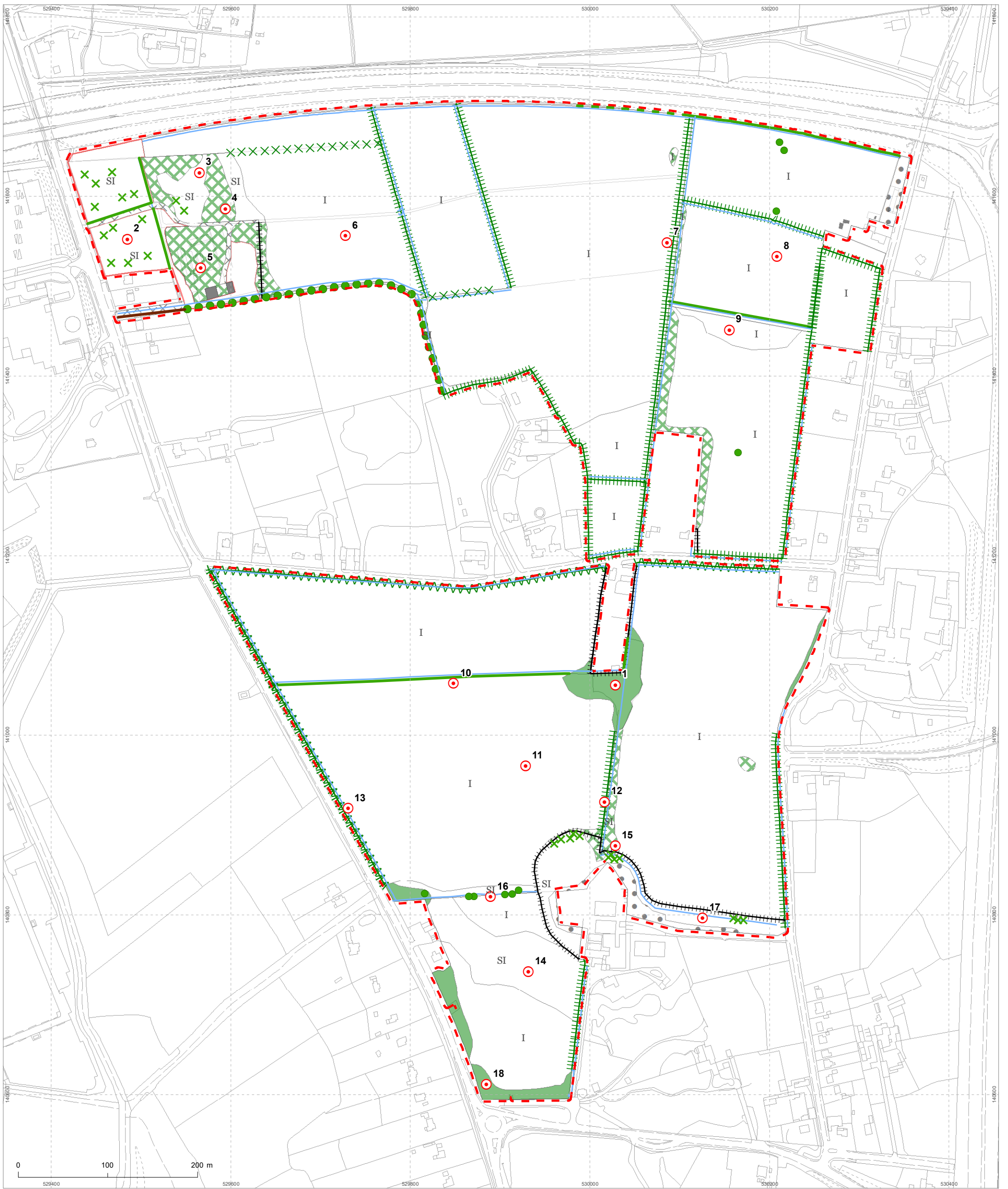
The CEMP should be submitted to the Local Planning Authority for Approval and implemented in full thereafter.

R6 Landscape and Ecology Management Plan (LEMP) – A Landscape and Ecology Management Plan should be produced setting out the detailed establishment and management of all on site compensation and enhancement measures that are included in the Biodiversity Net Gain Strategy. In accordance with Biodiversity Net Gain Best Practice Principles, and the principles of the Environment Act 2021, the LEMP should cover a period of 30 years from the date of commencement with provisions for long-term monitoring and contingency actions linked to objectives of the Biodiversity Net Gain Strategy.

The LEMP should be submitted to the Local Planning Authority for approval (typically to discharge planning conditions) and should be implemented in full thereafter.

7. DRAWINGS

Drawing C155543-01-01 – Phase 1 Habitat Map and Target Notes



Legend

- Scattered broad-leaved tree
- X Scattered scrub
- Ditch
- ++++ Fence
- Line of trees
- Ornamental hedgerow
- XXX Scrub
- - - Species-poor defunct hedgerow
- ||||| Species-poor hedgerow with trees
- Species-poor intact hedgerow
- VVV Species-rich hedgerow
- VVV Species-rich hedgerow with trees
- Site Boundary
- Target note
- Building
- Bare ground
- SI Improved grassland
- I Poor semi-improved grassland
- Dense scrub
- Semi-natural broad-leaved woodland
- Other - Scrub/grassland mosaic

Project Gatwick Green, West Sussex	
Drawing Phase 1 Habitat Map	
Client Savills	
Drawing Number C155543-01-01	Revision 00
Scale @ A3 1:4,000	Date December 2021
Approved By RW	Drawn By JR

MIDDLEMARCH ENVIRONMENTAL

Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
T:01676 525880 F:01676 521400
E:admin@middlemarch-environmental.com

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C155543-01-01

TARGET NOTES

Species abundance is given in accordance with the DAFOR system. D- Dominant, A – Abundant, F – Frequent, O – Occasional and R – rare. The suffix L is used as reference to local.

Target Note	Description
TN1	<p>J1.1 Broad-leaved semi-natural woodland A variable stand of broad-leaved woodland located at the interface between three fields. The woodland is composed of several scattered early-mature to mature oak <i>Quercus robur</i>, London plane <i>Platanus x acerifolia</i>, horse chestnut <i>Aesculus hippocastenum</i> and beech <i>Fagus sylvatica</i>, forming a tall and mostly enclosed canopy over a sparse shrub layer of hawthorn <i>Crataegus monogyna</i> (O) and elder <i>Sambucus nigra</i> (O). Towards the east of the woodland is a shrubby extension of young elm <i>Ulmus sp.</i> many of which have died and have been left in situ. The field layer comprised mostly bare ground with scattered nettle <i>Urtica dioica</i> and extensive disturbance from discarded waste and cattle poaching. Standing and fallen deadwood was present but evidence of regeneration (e.g. young saplings and seedlings) was absent.</p>
TN2	<p>J5 Other – Scrub/grassland mosaic An intermate mosaic of grassland and scrub occupying two field parcels interspersed by a hedgerow, wet ditch and disused access road. Grassland occupies approximately 40% of the mosaic and is comprised of a coarse unmanaged sward of variable height and composition overlying uneven and disturbed ground. The shorter areas of the sward are characterised by uneven and tussocky grasses including Yorkshire fog <i>Holcus lanatus</i> (A), cock's-foot <i>Dactylis glomerata</i> (O), red fescue <i>Festuca rubra</i> (O) and creeping bent <i>Agrostis stolonifera</i> (O). Forbs are frequent throughout but mainly comprise creeping buttercup <i>Ranunculus repens</i> (A) ribwort plantain <i>Plantago lanceolata</i> (O) common fleabane <i>Pulicaria dysenterica</i> (F), bristly ox-tongue <i>Helminthotheca echioides</i> (R) and birds-foot trefoil <i>Lotus corniculatus</i> (R). Interspersed throughout the shorter area of grassland are patches of taller herbs forming an ecotone with scattered areas of bramble <i>Rubus fruticosus agg.</i> scrub. Here, the grasses give way to black knapweed <i>Centaurea nigra</i> (F), nettle (O), creeping thistle <i>Cirsium arvense</i> (F), spear thistle (R), broad-leaved dock <i>Rumex obtusifolius</i> (O), clustered dock <i>Rumex conglomeratus</i> (R), hogweed <i>Heracelum sphondylium</i> (O) and Bridewort <i>Spiraea salicifolia agg.</i> (LA). Damper or inundated areas of ground are localised around rutted ground and are flanked by locally frequent soft rush <i>Juncus effusus</i>. The grassland is being encroached by patches of dense bramble scrub, most notably on a bund lining the central access road. Woody shrub species, including willow <i>Salix sp.</i> and hawthorn, are more frequent towards the west of the parcels forming an enclosed scrubby canopy in places. Discarded materials, such as rubble piles or tree trunks, are located along the central access road feature.</p>
TN3	<p>B6 – Poor semi-improved grassland An area of unmanaged grassland forming an uneven and somewhat tussocky sward overlying uneven ground. The sward is grass-dominated forming a closed sward of Yorkshire fog (F), common couch <i>Elytrigia repens</i> (F) creeping bent (F) cocks-foot (O) and red fescue (O). Forbs were mostly absent with the exception of creeping buttercup (O), wood dock <i>Rumex sanguineus</i> (F) and common sorrel <i>Rumex acetosa</i> (R). The grassland is partially grazed (rabbits) but is succumbing to bramble encroachment at the margins.</p>
TN4	<p>A2.1 Dense scrub A stand of dense bramble scrub enclosing TN3 and extending southwards along a raised bund. The scrub is uniform throughout, to 2 m high, with only occasional associates such as rose <i>Rosa sp.</i> butterfly bush <i>Buddleia davidii</i> and oak saplings (R). A thin margin of tall herbs such as common nettle and creeping thistle were present along the norther margins. To the east the bramble scrub patchily extends along a former field boundary. Several Leyland cypress <i>Cupressus x leylandii</i> punctuated the scrub corridor.</p>
TN5	<p>A2.1 Dense scrub Mature woody scrub forming an enclosed canopy over the foundations of a brick-built structure. The scrub is dominated by hawthorn (A) with hazel <i>Corylus avellana</i> (R) and rose <i>Rosa sp.</i> (O), overtopped by a tall canopy of willows <i>Salix sp.</i> (F). Interspersing the shrubs is a dense field layer of bramble which gives way to some open glades that are loosely vegetated with nettle (O), common fleabane (LA), male fern <i>Dryopteris filix-mas</i> (R), wood dock (O), wood avens <i>Geum urbanum</i> (O) and cowslip <i>Primula veris</i> (R). The scrub extends to the south and surrounds two built structures.</p>
TN6	<p>B4 Improved grassland Four large, open fields of modified pasture and/or silage intersected by a network of hedgerows with trees and ditches. The field are mostly flat with some localised areas of waterlogging throughout. The sward is uniform in height, having been grazed or cut, and grass-dominated with an average of 4 species/m². Composition was similar to that in TN3 with the additional of rye-grass <i>Lolium sp.</i> A well-used and rutted vehicle track runs though the fields on an east-west axis. Two small fields to the south of this area were separated by electric fence and were subject to horse grazing. Species composition appeared similar, but the ground was heavily disturbed by poaching.</p>

TN7	<p>J2.3.2 Species poor hedgerow with trees (with ditch) An extensive boundary feature running on a north – south axis in the northern half of the site. The feature comprises a loose hedgerow canopy to 1.5 m high and c. 1 m wide located on the western bank of the associated drainage ditch. The hedge is species-poor and is dominated by hawthorn and blackthorn <i>Prunus spinosa</i> with rare to occasional holly <i>Ilex aquifolium</i>, yew <i>Taxus baccata</i>, ash <i>Fraxinus excelsior</i> and willow <i>Salix sp.</i>. Overtopping the hedge is a tall continuous canopy of semi-mature to mature oaks to 12 m in height. The ditch is situated on the eastern aspect of the hedge and comprises a 1.2 m wide channel with banks to 0.5 m high and a water depth of up to 0.2 m. No flow was evident, and the bed material appeared to be composed of silt. The ditch was shaded along its length with no evidence of aquatic vegetation present. Beyond the ditch on the eastern side of the hedge is a margin of scrub dominated by bramble and elder which runs along c. 50% of the length of the hedgerow.</p>
TN8	<p>B4 Improved grassland Three smaller fields of modified grassland, similar in composition to TN6 but heavily grazed by horses and cattle with evidence of poaching throughout. The sward is short-cropped to <5 cm with areas of taller growth around the margins of the field. The fields are intersected by boundary hedgerows and ditch features which are clipped but retain a relatively continuous canopy. The fields lead onto a small cattle pen in the northeast corner, beyond which is an unsurfaced farmyard occupied by farm machinery and materials.</p>
TN9	<p>B4 Improved grassland A localised section of inundated improved grassland running along a hedgerow boundary. The grassland was grazed to a uniform height similar to the surrounding field, but additional species associated with frequent waterlogging are present including soft rush (LF), common spike-rush <i>Elocharis palustris</i> (O), marsh foxtail <i>Alopecurus geniculatus</i> (O) and creeping buttercup.</p>
TN10	<p>J2.3.1 Species-poor intact hedgerow A mature species-rich hedgerow with frequent trees and a ditch present along the western boundary of the site. The hedgerow had a variable shrubby canopy, which is c.3 m high, up to 3 m wide and is mostly unmanaged, becoming thinned but not gappy in parts. Hawthorn is frequent throughout along with rose <i>Rosa sp.</i>(O), privet <i>Ligustrum vulgare</i> (O), willow <i>Salix sp.</i> (F), holly (O), elder (O) and blackthorn (O). Bramble is abundant throughout filling canopy gaps and sprawling through the canopy. The hedge is overtopped by a tall continuous canopy of early-mature to mature oaks together with some young growth breaching the shrubby canopy. The ditch is located on the western side of the hedgerow along Balcombe Road set in a wide rough grassland margin. The ditch is c.1.5 m wide and 0.5 m deep with ditch banks on the roadside extending up to 1 m deep. A body of standing water was present to a depth of 0.3 m. The ditch is heavily shaded with no evident aquatic or marginal vegetation apart from occasional soft rush.</p>
TN11	<p>B4 Improved grassland Four large fields of modified grazing pasture in the south of the site intersected by boundary hedgerows with trees and ditches. The fields are composed of wet brown earth with extensive areas of waterlogging. The eastern-most field was subject to heavy cattle poaching at the time of survey. The sward was short-grazed to a height of <5cm and had a species-poor composition of c.5 – 7 species/m². Perennial rye-grass, Yorkshire fog and creeping bent were all frequent throughout with occasional red fescue and cock's-foot. Forbs were present but scattered and included dandelion <i>Taraxacum agg.</i>, ribwort plantain, white clover <i>Trifolium repens</i>, cats-ear <i>Hypochaeris radicata</i>, creeping buttercup, cranesbill <i>Geranium sp.</i>, and bird's-foot trefoil (R). Soft rush is frequent in the damper areas of the grassland becoming locally abundant in the north-western field.</p>
TN12	<p>J2.3.2 Species poor hedgerow with trees (with ditch) A mature field boundary hedgerow with trees and a ditch extending from the central woodland (TN1) to the southern boundary of the site. The hedgerow comprises a loose and thin shrubby layer to 1.5 m in height and c. 1 m wide which is unmanaged. Hawthorn is dominant along its length with occasional young ash. Overtopping the canopy is a continuous, tall canopy dominated by early-mature to mature oaks and rare horse chestnut with some young oak growth beneath. The hedgerow lines a ditch which is approach 0.5 m wide with sloping banks to 0.5 m deep. A body of standing water was present to 0.2 m deep which is heavily silted up and appears polluted by contaminants from the conjoining ditch (TN17).</p>
TN13	<p>J2.2.1 Species-poor intact hedgerow An intact hedgerow with associated ditch and scattered trees. The hedgerow is clipped to 2 m in height and 1 m in width with occasional minor gaps in the canopy. Hawthorn is dominant in the hedgerow with occasional dog rose <i>Rosa sp.</i> and bramble together with 4-5 loosely scattered semi-mature oak standards, principally in the western half of the hedgerow. The ditch is located to the south of the hedgerow and is 1.2 m wide with 1.5 m deep, steep sloping banks. A body of standing water is present to 0.1 m deep with a silt channel base and frequent evidence of poaching from the adjacent grassland to the south. Sections of the ditch have some limited aquatic vegetation including hemlock water dropwort <i>Oenanthe crocata</i> (O) and lesser water parsnip <i>Berula erecta</i> (O) and marginal bittercress <i>Cardamine sp.</i> (F) and willowherb <i>Epilobium hirsutum</i> (O).</p>

TN14	<p>B6 Poor semi-improved grassland An area of TN11 currently inundated or highly disturbed by recent flooding or inundation. At the time of survey, there was a water flow entering the field from the hedgerow boundary and draining to the northwest. A large body of water was present in the centre of this whilst surrounding areas were saturated and hummocky and eroded. The grassland area that was exposed appeared to have a similar composition to the surrounding improved grasslands but with a higher proportion of bare ground and several species typical of aquatic conditions including water starwort <i>Callitriche sp.</i> and duckweed <i>Lemna sp.</i> along with a high proportion of damp tolerant species such as creeping buttercup. The classification of poor semi-improved, as opposed to improved, is a precautionary classification recognising the inundation to have some effects on the composition of the grassland.</p>
TN15	<p>A2.1 Dense scrub A linear area of bramble scrub occupying a 3-4 m wide margin along the boundary hedgerow and ditch (TN12). The scrub is patchy in places where it has been disturbed by livestock but otherwise the bramble forms discrete blocks with occasional elder and nettle (F) and cleavers <i>Galium aparine</i> (F) in the field layer. To the south, the scrub extends up a large mound feature (See TN17) and around the base of TN12. In this area bramble gives way to extensive butterfly bush.</p>
TN16	<p>A3.1 Broad-leaved trees (and Ditch) Five mature to over-mature oak trees situated along a ditch and bank feature. The trees are free standing with no shrubby canopy beneath but with some overlap in canopy between the three to the west and the two to the east. The ditch feature is situated to the north of the trees emerges from a culvert to the east and discharges to a ditch on the western boundary. The ditch is c. 1 m deep and 1 m wide with steep sided banks that grade into a shallow mound feature along the northern bank. Only the western half of the ditch contained a body of standing water whilst to the east the channel was dry with covering of grasses suggesting this part of the ditch periodically dries out. No aquatic vegetation was observed along any part of the ditch.</p>
TN17	<p>B6 Poor semi-improved grassland An artificial bund feature enclosing an operational works area to the south. To the east, the bund has a trapezoidal cross section to 3 m in height and c.3-4 m in width which becomes overtopped by a large spoil mound to 10 m high towards the middle of the southern boundary. The bund is accompanied by a ditch feature which runs along the base of the bund on its northern aspect. The ditch is approximately 0.3 to 1.5 m wide with its widest section to the west where it joins with the adjoining ditch at TN12. The bund is disturbed in parts with patches of bare ground but is otherwise loosely vegetated with a coarse grassy sward of common couch (F), cocks-foot (F), Yorkshire fog (O), red fescue (O) and creeping bent (F). Tall herbs including teasel <i>Dipsacus fullonum</i> (F), common fleabane (LA) cleavers (F), Canadian fleabane <i>Erigeron canadensis</i> (O) and nettle were frequent to locally abundant throughout, along with locally abundant patches of encroaching brambles and butterfly bush. The ditch had a body of standing water to 0.1 m deep but was heavily silted and the poor water clarity suggested likely presence of contaminants. The ditch was largely devoid of aquatic vegetation with the exception of a small stand of floating sweet-grass <i>Glyceria sp.</i> and a margin of hard rush <i>Juncus inflexus</i>. To the west, the bund continues to encircle the works area at a height of approximately 6 m with steep sloping sides. Here the composition is similar to that to the east but without the ditch feature present.</p>
TN18	<p>A1.1.1 Broad-leaved semi-natural woodland An area of established broad-leaved woodland lining the southern and (in part) western boundaries of the site. The woodland is principally located outside the red line boundary but overhangs or loosely extends into the site along the field boundaries. The woodland is widest to the south c.10 -12 m wide and overlies a series of un-even mounds. The canopy is mostly even-aged with some mature trees scattered towards the margins. Sycamore <i>Acer pseudoplatanus</i> is the dominant canopy species with occasional London plane, oak, and silver birch <i>Betula pendula</i>. The shrub layer is sparse beneath with holly(O), hawthorn (O), cherry laurel <i>Prunus laurocerasus</i> and elm (R). The field layer comprises a covering carpet of ivy <i>Hedera helix</i>, with frequent remote sedge <i>Carex remota</i>, garlic mustard <i>Alliaria petiolata</i> (O), nettle (O) ground elder <i>Aegopodium podagraria</i> (R), wood sedge <i>Carex sylvatica</i> (R), male fern (R) and nipplewort <i>Lapsana communis</i> (R). Extensive sycamore seedlings were also present throughout the field layer.</p>

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APPENDICES

APPENDIX A: Overview of Legislation and Policy

APPENDIX A: Relevant Species Legislation

APPENDIX A

Overview of Legislation and Policy

Overview of Legislation and Policy

This section provides an overview of the framework of legislation and policy which underpins nature conservation and is a material consideration in the planning process in England. The reader should refer to the original legislation for the definitive interpretation.

3.1 General Biodiversity Legislation and Policy

The Conservation of Habitats and Species Regulations 2017 (as amended) (the Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (the Habitats Regulations 2019)

The Habitats Regulations 2017 (as amended) transposed the land and marine aspects of the Habitats Directive (Council Directive 92/43/EEC) and certain elements of the Wild Birds Directive (Directive 2009/147/EC) (known as the Nature Directives) into English and Welsh law. Changes have been made to parts of the Habitats Regulations 2017 so that they operate effectively from 1 January 2021. The changes are made by the Habitats Regulations 2019, which transfer functions from the European Commission to the appropriate authorities in England and Wales.

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The obligations of a competent authority in the 2017 Regulations for the protection of sites or species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

The Habitats Regulations 2019 have created a 'National Site Network' on land and at sea, including both the inshore and offshore marine areas in the UK. The National Site Network includes:

- Existing Special Areas of Conservation (SACs), which are designated due to their importance to the habitats and species listed in Annexes I and II of the Habitats Directive;
- Existing Special Protection Areas (SPAs), which are designated due to their importance for wild birds in accordance with the Wild Birds Directive; and,
- New SACs and SPAs designated under these Regulations.

SACs and SPAs in the UK no longer form part of the European Union's Natura 2000 ecological network. Any references to Natura 2000 in the 2017 Regulations and in guidance now refers to the new National Site Network. However, guidance provided by Freeths (2020) recommends that SACs and SPAs can continue to be referred to as "European sites" / "European marine sites".

Designated Wetlands of International Importance (known as Ramsar sites) do not form part of the National Site Network. Many Ramsar sites overlap with SACs and SPAs and may be designated for the same or different species and habitats. All Ramsar sites remain protected in the same way as SACs and SPAs.

The 2019 Regulations establish management objectives for the National Site Network. The network objectives are to:

- Maintain or, where appropriate, restore habitats and species listed in Annexes I and II of the Habitats Directive to a favourable conservation status; and,
- Contribute to ensuring, in their area of distribution, the survival and reproduction of wild birds and securing compliance with the overarching aims of the Wild Birds Directive.

The appropriate authorities must also have regard to the:

- Importance of protected sites;
- Coherence of the National Site Network; and,
- Threats of degradation or destruction (including deterioration and disturbance of protected features) on SPAs and SACs.

The network objectives contribute to the conservation of UK habitats and species that are also of pan-European importance, and to the achievement of their favourable conservation status within the UK.

The Wildlife and Countryside Act (WCA) 1981 (as amended)

The WCA, as amended, consolidates and amends pre-existing national wildlife legislation in order to implement the Bern Convention and the Birds Directive. It complements the Habitat Regulations 2017 and the Habitats Regulations 2019, offering protection to a wider range of species. The Act also provides for the designation and protection of national conservation sites of value for their floral, faunal or geological features, termed Sites of Special Scientific Interest (SSSIs).

Schedules of the act provide lists of protected species, both flora and fauna, and detail the possible offences that apply to these species.

The Countryside and Rights of Way (CRoW) Act 2000

The CROW Act, introduced in England and Wales in 2000, amends and strengthens existing wildlife legislation detailed in the WCA. It places a duty on government departments and the National Assembly for Wales to have regard for biodiversity, and provides increased powers for the protection and maintenance of SSSIs. The Act also contains lists of habitats and species (Section 74) for which conservation measures should be promoted, in accordance with the recommendations of the Convention on Biological Diversity (Rio Earth Summit) 1992.

The Natural Environment and Rural Communities (NERC) Act 2006

Section 40 of the NERC Act places a duty upon all local authorities and public bodies in England and Wales to promote and enhance biodiversity in all of their functions. Sections 41 (England) and 42 (Wales) list habitats and species of principal importance to the conservation of biodiversity. These lists superseded Section 74 of the CRoW Act 2000.

The Hedgerow Regulations 1997

The Hedgerow Regulations make provision for the identification of important hedgerows which may not be removed without permission from the Local Planning Authority.

UK Post-2010 Biodiversity Framework

The UK Biodiversity Action Plan (BAP), published in 1994, was the UK Government's response to signing the Convention on Biological Diversity (CBD) at the 1992 Rio Earth Summit. The new UK Post-2010 Biodiversity Framework replaces the previous UK level BAP. The UK Post-2010 Biodiversity Framework covers the period 2011-2020 and forms the UK Government's response to the new strategic plan of the United Nations Convention on Biological Diversity (CBD), published in 2010 at the CBD meeting in Nagoya, Japan. This includes five internationally agreed strategic goals and supporting targets to be achieved by 2020. The five strategic goals agreed were:

- Address the underlying causes of biodiversity loss by mainstreaming biodiversity across government and society;
- Reduce the direct pressures on biodiversity and promote sustainable use;
- To improve the status of biodiversity by safeguarding ecosystems, species and genetic diversity;
- Enhance the benefits to all from biodiversity and ecosystem services; and,
- Enhance implementation through participatory planning, knowledge management and capacity building.

The Framework recognises that most work which was previously carried out under the UK BAP is now focused on the four individual countries of the United Kingdom and Northern Ireland, and delivered through the countries' own strategies. Following the publication of the new Framework the UK BAP partnership no longer operates but many of the tools and resources originally developed under the UK BAP still remain of use and form the basis of much biodiversity work at country level. In England the focus is on delivering the outcomes set out in the Government's 'Biodiversity 2020: a Strategy for England's Wildlife and Ecosystem Services' (DEFRA, 2011). This sets out how the quality of our environment on land and at sea will be improved over the next ten years and follows on from policies contained in the Natural Environment White Paper.

Species and Habitats of Material Consideration for Planning in England

Previous planning policy (and some supporting guidance which is still current, e.g. ODPM Circular 06/2005, now under revision), refers to UK BAP habitats and species as being a material consideration in the planning process. Equally many local plans refer to BAP priority habitats and species. Both remain as material considerations in the planning process but such habitats and species are now described as Species and Habitats of Principal Importance for Conservation in England, or simply priority habitats and priority species under the UK Post-2010 Biodiversity Framework. The list of habitats and species remains unchanged and is

still derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006. As was previously the case when it was a BAP priority species hen harrier continues to be regarded as a priority species although it does not appear on the Section 41 list.

3.2 National Planning Policy Framework and Practice Guidance

In July 2021, the National Planning Policy Framework (NPPF) was updated, replacing the previous framework published in 2012 and revised in 2018 and 2019. A presumption towards sustainable development is at the heart of the NPPF. This presumption does not apply however where developments require appropriate assessment under the Birds or Habitats Directives.

Chapter 15, on conserving and enhancing the natural environment, sets out how the planning system should contribute to and enhance the natural and local environment by:

- protecting and enhancing existing sites of biodiversity value;
- minimising impacts on and providing net gains for biodiversity; and,
- establishing coherent ecological networks.

If a proposed development would result in significant harm to the natural environment which cannot be avoided (through the use of an alternative site with less harmful impacts), mitigated or compensated for (as a last resort) then planning permission should be refused. With respect to development on land within or outside of a Site of Special Scientific Interest (SSSI) which is likely to have an adverse effect (either alone or in-combination with other developments) would only be permitted where the benefits of the proposed development clearly outweigh the impacts on the SSSI itself, and the wider network of SSSIs. Development resulting in the loss of deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused unless there are wholly exceptional reasons for the development, and a suitable compensation strategy is provided.

Chapter 15 identifies that development whose primary objective is to conserve or enhance biodiversity should be supported and opportunities to improve biodiversity in and around developments should be integrated as part of their design, especially where this can secure measurable net gains for biodiversity or enhance public access to nature.

Chapter 11, making effective use of the land, sets out how the planning system should promote use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions. Substantial weight should be given to the value of using suitable brownfield land within settlements for homes and other identified needs. Opportunities for achieving net environmental gains, including new habitat creation, are encouraged.

In March 2014 the Department for Communities and Local Government released guidance to support the National Planning Policy Framework (NPPF), known as the National Planning Practice Guidance (NPPG). This has been produced to provide guidance for planners and communities which will help deliver high quality development and sustainable growth in England.

The guidance includes a section entitled 'Natural Environment: Biodiversity, geodiversity and ecosystems and green infrastructure', which was updated in July 2019. This document sets out information with respect to the following:

- the statutory basis for seeking to conserve and enhance biodiversity;
- the local planning authority's requirements for planning for biodiversity;
- what local ecological networks are and how to identify and map them;
- how plan-making bodies identify and safeguard Local Wildlife Sites, including Standard Criteria for Local Wildlife Sites;
- the sources of ecological evidence;
- the legal obligations on local planning authorities and developers regarding statutory designated sites and protected species;
- definition of green infrastructure;
- where biodiversity should be taken into account in preparing a planning application;
- how policy should be applied to avoid, mitigate or compensate for significant harm to biodiversity and how mitigation and compensation measures can be ensured;
- definitions of biodiversity net gain including information on how it can be achieved and assessed; and,

- the consideration of ancient woodlands and veteran trees in planning decisions and how potential impacts can be assessed.

The NPPG July 2019 issue also includes a section entitled 'Appropriate assessment: Guidance on the use of Habitats Regulations Assessment' which provides information in relation to Habitats Regulations Assessment processes, contents and approaches in light of case law. This guidance will be relevant to those projects and plans which have the potential to impact on European Sites and European Offshore Marine Sites identified under the Conservation of Habitats and Species Regulations 2017 (as amended).

3.3 Local Planning Policy – Crawley Borough

Local Plan: Crawley 2030

Crawley's Local Plan, Crawley 2030, was adopted on the 16th December 2015. It forms the council's development plan and sets the planning policies under which development control decisions will be taken. The policies of relevance to ecology are:

Policy ENV1: Green Infrastructure

Crawley's multi-functional green infrastructure network will be conserved and enhanced through the following measures:

- i. Development which protects and enhances green infrastructure will be supported;
- ii. Development proposals should take a positive approach to designing green infrastructure, utilizing the council's supplementary planning documents to integrate and enhance the green infrastructure network;
- iii. Proposals which reduce, block or harm the functions of green infrastructure will be required to be adequately justified, and mitigate against any loss or impact or as a last resort compensate to ensure the integrity of the green infrastructure network is maintained;
- iv. The strategic green infrastructure network is afforded the highest protection due to its high value from existing or identified potential multiple functions, for example as recreation, routeways, access to the countryside, wildlife and climate mitigation;
- v. Proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond;
- vi. Large proposals will be required to provide new and/or create links to green infrastructure where possible.

Policy ENV2: Biodiversity

All development proposals will be expected to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation value within and around the development.

Habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value based on past ecological surveys.

Hierarchy of Biodiversity Sites

To ensure a net gain in biodiversity, the following areas will be conserved and enhanced where possible and the council will support their designation and management:

1. Nationally designated sites:
 - Sites of Special Scientific Interest (SSSI)

SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.

2. National Planning Policy Framework Sites
 - Ancient Woodland, and aged or veteran trees

Planning permission will not be granted for development that results in the loss or deterioration of ancient woodland and aged or veteran trees unless the need for, and benefits of, the development in that location clearly outweigh the loss. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.

3. Locally designated sites, and habitats and species outside designated sites:

- Local Nature Reserves
- Sites of Nature Conservation Importance
- Nature Improvement Areas
- Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans
- Biodiversity Opportunity Areas
- Where Protected Species are present
- Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006.

Proposals which would result in significant harm to biodiversity will be refused unless:

- i. this can be avoided by locating on an alternative site with less harmful impact; or
- ii. the harm can be adequately mitigated, or, as a last resort, compensated for.

APPENDIX B

Relevant Species Legislation

Badger

Badgers and their setts are protected under the Protection of Badgers Act 1992. The Protection of Badgers Act 1992 is based primarily on the need to protect badgers from baiting and deliberate harm or injury, badgers are not protected for conservation reasons. The following are criminal offences:

- To intentionally or recklessly interfere with a sett. Sett interference includes disturbing badgers whilst they are occupying a sett, as well as damaging or destroying a sett or obstructing access to it.
- To wilfully kill, injure, take, possess or cruelly ill-treat a badger, or to attempt to do so.

A badger sett is defined in the legislation as:

- *'Any structure or place that displays signs indicating current use by a badger'*.

'Current use' is not synonymous with current occupation and a sett is defined as such (and thus protected) as long as signs of current usage are present. Therefore, a sett is protected until such a time as the field signs deteriorate to such an extent that they no longer indicate 'current usage'.

Badger sett interference can result from a multitude of operations including excavation and coring, even if there is no direct damage to the sett, such as through the disturbance of badgers whilst occupying the sett. Any intentional or reckless work that results in the interference of badger setts is illegal without a licence from Natural England. In England a licence must be obtained from Natural England before any interference with a badger sett occurs.

Bats

Bats and the places they use for shelter or protection (i.e. roosts) receive legal protection under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (Habitats Regulations 2019). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that bats, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a bat;
- deliberately disturb bats; or
- damage or destroy a bat roost (breeding site or resting place).

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead bats, part of a bat or anything derived from bats, which has been unlawfully taken from the wild.

Changes have been made to parts of the Habitats Regulations 2017 so that they operate effectively from 1st January 2021. The changes are made by the Habitats Regulations 2019, which transfer functions from the European Commission to the appropriate authorities in England and Wales.

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The obligations of a competent authority in the 2017 Regulations for the protection of species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.

- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, or *obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CRoW) Act 2000.

As bats re-use the same roosts (breeding site or resting place) after periods of vacancy, legal opinion is that roosts are protected whether or not bats are present.

The following bat species are Species of Principal Importance for Nature Conservation in England: barbastelle bat *Barbastella barbastellus*, Bechstein's bat *Myotis bechsteinii*, noctule *Nyctalus noctula*, soprano pipistrelle *Pipistrellus pygmaeus*, brown long-eared bat *Plecotus auritus*, greater horseshoe bat *Rhinolophus ferrumequinum* and lesser horseshoe bat *Rhinolophus hipposideros*. Species of Principal Importance for Nature Conservation in England are material considerations in the planning process. The list of species is derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006.

Birds

The Conservation of Habitats and Species Regulations 2017, (Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (Habitats Regulations 2019) places a duty on public bodies to take measures to preserve, maintain and re-establish habitat for wild birds.

Nesting and nest building birds are protected under the Wildlife and Countryside Act WCA 1981 (as amended).

Subject to the provisions of the act, if any person intentionally:

- kills, injures or takes any wild bird;
- takes, damages or destroys the nest of any wild bird while that nest is in use or being built; or
- takes or destroys an egg of any wild bird, he shall be guilty of an offence.

Some species (listed in Schedule 1 of the WCA) are protected by special penalties. Subject to the provisions of the act, if any person intentionally or recklessly:

- disturbs any wild bird included in Schedule 1 while it is building a nest or is in, on or near a nest containing eggs or young; or
- disturbs dependent young of such a bird, he shall be guilty of an offence.

Several bird species are Species of Principal Importance for Nature Conservation in England, making them capable of being material considerations in the planning process.

Brown hare

Brown hare receive some protection under Schedule 5A of the Wildlife and Countryside Act 1981 (as amended); this section of the Act lists animals which may not be killed or taken by certain methods during their close season.

Brown hares are a Species of Principal Importance for Nature Conservation in England and are thus capable of being material considerations in the planning process.

Common amphibians

Common frogs, common toad, smooth newt and palmate newt are protected in Britain under Schedule 5 of the Wildlife and Countryside Act (1981, as amended) with respect to sale only. They are also listed under Annex III of the Bern Convention 1979. Any exploitation of wild fauna specified in Appendix III shall be regulated in order to keep the populations out of danger. The convention seeks to prohibit the use of all indiscriminate means of capture and killing and the use of all means capable of causing local disappearance of, or serious disturbance to, populations of a species.

Common toad is listed as a Species of Principal Importance for Nature Conservation in England.

Dormice

Dormice and the places they use for shelter or protection receive legal protection under the Conservation of Habitats and Species Regulations 2017 (Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (Habitats Regulations 2019). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that dormice, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a dormouse;
- deliberately disturb dormice; or
- damage or destroy a breeding site or resting place.

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead dormouse, part of a dormouse or anything derived from a dormouse, which has been unlawfully taken from the wild.

Changes have been made to parts of the Habitats Regulations 2017 so that they operate effectively from 1st January 2021. The changes are made by the Habitats Regulations 2019, which transfer functions from the European Commission to the appropriate authorities in England and Wales.

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The obligations of a competent authority in the 2017 Regulations for the protection of species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, or *obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CRoW) Act 2000.

Dormice are listed as a Species of Principal Importance for Nature Conservation in England.

Great crested newts

Great crested newts (GCN) and the places they use for shelter or protection receive legal protection under the Conservation of Habitats and Species Regulations 2017, (Habitats Regulations 2017) and the Conservation of Habitats and Species Regulations (Amendment) (EU Exit) Regulations 2019 (Habitats Regulations 2019). They receive further legal protection under the Wildlife and Countryside Act (WCA) 1981, as amended. This protection means that GCN, and the places they use for shelter or protection, are capable of being a material consideration in the planning process.

Regulation 41 of the Habitats Regulations 2017, states that a person commits an offence if they:

- deliberately capture, injure or kill a GCN;
- deliberately disturb GCN;

- deliberately take or destroy eggs of a GCN; or
- damage or destroy a GCN breeding site or resting place.

Disturbance of animals includes in particular any disturbance which is likely to impair their ability to survive, to breed or reproduce, or to rear or nurture their young, or in the case of animals of a hibernating or migratory species, to hibernate or migrate; or to affect significantly the local distribution or abundance of the species to which they belong.

It is an offence under the Habitats Regulations 2017 for any person to have in his possession or control, to transport, to sell or exchange or to offer for sale, any live or dead GCN, part of a GCN or anything derived from GCN, which has been unlawfully taken from the wild. This legislation applies to all life stages of GCN.

Changes have been made to parts of the Habitats Regulations 2017 so that they operate effectively from 1st January 2021. The changes are made by the Habitats Regulations 2019, which transfer functions from the European Commission to the appropriate authorities in England and Wales.

All other processes or terms in the 2017 Regulations remain unchanged and existing guidance is still relevant.

The obligations of a competent authority in the 2017 Regulations for the protection of species do not change. A competent authority is a public body, statutory undertaker, minister or department of government, or anyone holding public office.

Whilst broadly similar to the above legislation, the WCA 1981 (as amended) differs in the following ways:

- Section 9(1) of the WCA makes it an offence to *intentionally* kill, injure or take any protected species.
- Section 9(4)(a) of the WCA makes it an offence to *intentionally or recklessly** damage or destroy, or *obstruct access to*, any structure or place which a protected species uses for shelter or protection.
- Section 9(4)(b) of the WCA makes it an offence to *intentionally or recklessly** disturb any protected species *while it is occupying a structure or place which it uses for shelter or protection*.

*Reckless offences were added by the Countryside and Rights of Way (CRoW) Act 2000.

GCN are listed a Species of Principal Importance for Nature Conservation in England which means they are a material consideration in the planning process. The list of species is derived from Section 41 list of the Natural Environmental and Rural Communities (NERC) Act 2006.

Harvest mouse

Harvest mouse is a Species of Principal Importance for Nature Conservation in England and as such is capable of being a material consideration in the planning process.

Hedgehog

Hedgehogs receive some protection under Schedule 6 of the Wildlife and Countryside Act 1981 (as amended); this section of the Act lists animals which may not be killed or taken by certain methods, namely traps and nets, poisons, automatic weapons, electrical devices, smokes/gases and various others. Humane trapping for research purposes requires a licence.

Hedgehogs are a Species of Principal Importance for Nature Conservation in England and are thus capable of being material considerations in the planning process.

Invertebrates

The small heath butterfly is listed on Section 42 of the NERC Act (2006).

Reptiles

All of the UK's native reptiles are protected by law. The two rarest species – sand lizard (*Lacerta agilis*) and smooth snake (*Coronella austriaca*) – benefit from the greatest protection; however these two species are not known to on or in proximity to the site. Common lizard (*Zootoca vivipara*), slow-worm (*Anguis fragilis*), adder (*Vipera berus*) and grass snake (*Natrix natrix*) are protected under the Wildlife and Countryside Act 1981 as amended from intentional killing or injuring.

In England and Wales, this Act has been amended by the Countryside and Rights of Way Act 2000 (CRoW), which adds an extra offence, makes species offences arrestable, increases the time limits for some prosecutions and increases penalties. The Natural Environment and Rural Communities (NERC) Act 2006 places a duty on Government Departments to have regard for the conservation of biodiversity and maintains lists of species and habitats which are of principal importance for the purposes of conserving biodiversity in England and Wales. All native reptile species are included on these lists.

This is a simplified description of the legislation. In particular, the offences mentioned here may be absolute, intentional, deliberate or reckless. Note that where it is predictable that reptiles are likely to be killed or injured by activities such as site clearance, this could legally constitute intentional killing or injuring.

Appendix C - Addendum: Hedgerow Regulations Assessment

**GATWICK GREEN, CRAWLEY, WEST
SUSSEX**

**ADDENDUM TO HEDGEROW REGULATIONS
(1997) ASSESSMENT**

A Report to: Savills

Report No: RT-MME-154978-02

Date: June 2021



Triumph House, Birmingham Road, Allesley, Coventry CV5 9AZ
Tel: 01676 525880 Fax: 01676 521400

E-mail: admin@middlemarch-environmental.com Web: www.middlemarch-environmental.com

REPORT VERIFICATION AND DECLARATION OF COMPLIANCE

Report Version	Date	Completed by:	Checked by:	Approved by:
Final	17/06/2021	Hannah Train ACIEEM (Principal Consultant)	Tom Docker CEcol MCIEEM (Managing Director)	Colin Bundy MCIEEM (Associate Director)

The information which we have prepared is true, and has been prepared and provided in accordance with the Chartered Institute of Ecology and Environmental Management's Code of Professional Conduct. We confirm that the opinions expressed are our true and professional bona fide opinions.

DISCLAIMER

The contents of this report are the responsibility of Middlemarch Environmental Ltd. It should be noted that, whilst every effort is made to meet the client's brief, no site investigation can ensure complete assessment or prediction of the natural environment.

Middlemarch Environmental Ltd accepts no responsibility or liability for any use that is made of this document other than by the client for the purposes for which it was originally commissioned and prepared.

1. INTRODUCTION

- 1.1 This Note is an Addendum to the report by Middlemarch Environmental Ltd (MEL) entitled 'Gatwick Green, Crawley, West Sussex: Hedgerow Regulations (1997) Assessment' dated 27 February 2020 (2020 HRE) on behalf of the Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area; a site known as Gatwick Green. Gatwick Green is proposed for a comprehensive industrial-led development of predominantly storage and distribution uses.

2. SITE AND PROJECT BACKGROUND

- 2.1 The allocated site extends to 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan at **Appendix 1** (Gatwick Green / the Site). Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 ha under policies EC1 and EC4. Policy EC4 makes provision, where evidenced, for additional industrial land beyond this amount. Limited complementary ancillary uses are provided for such as offices and small scale convenience retail and leisure facilities that would support the industrial-led function. Policy EC4 goes on to set out a range of development management provisions relating to transport and access, sustainable design and construction, digital technology and character and design, with further requirements related to the assessment of economic impacts and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP, are designed to ensure that the site is developed in a sustainable manner.
- 2.2 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed. The AAP would be advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, that in turn allowed for the identification of a Strategic Employment Location at Gatwick Green. The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.

3. REVIEW OF 2020 HEDGEROW REGULATIONS (1997) ASSESSMENT

- 3.1 The 2020 HRE provided an assessment of the hedgerows on the Site to inform its promotion for employment purposes by TWG. This Addendum provides an update to the 2020 HRE in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.

- 3.2 Based on the changed planning policy status of the site, MEL has reviewed the scope and nature of the hedgerow surveys undertaken to inform the 2020 HRE. The 2020 HRE was informed by survey work undertaken in November 2019: the survey covered broadly the same area of land now being proposed as an allocation.
- 3.3 At the time of the survey in November 2020, a total of 14 hedgerows considered suitable for assessment under the Hedgerow Regulations (1997) were identified on site. The majority of these hedgerows were frequently managed and species-poor, typical of arable field boundaries or roadsides. The hedgerows tended to have an impoverished hedge ground flora, often as a result of nutrient enrichment from agricultural and highways runoff. Following an assessment against the wildlife and landscape criteria detailed in the Hedgerow Regulations (1997), two hedgerows (H1 and H2) were deemed to be 'important'. Both hedgerows satisfied the criteria relating to the number of woody species recorded and the criteria for associated features.

4. CONCLUSION

- 4.1 MEL confirms that the survey work remains in date and that consequently, the conclusions and recommendations in the 2020 HRE remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP through the forthcoming Examination. Consequently, the 2020 HRE remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.



APPENDICES

Appendix 1 Gatwick Green – Site Plan

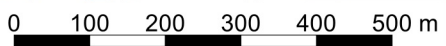
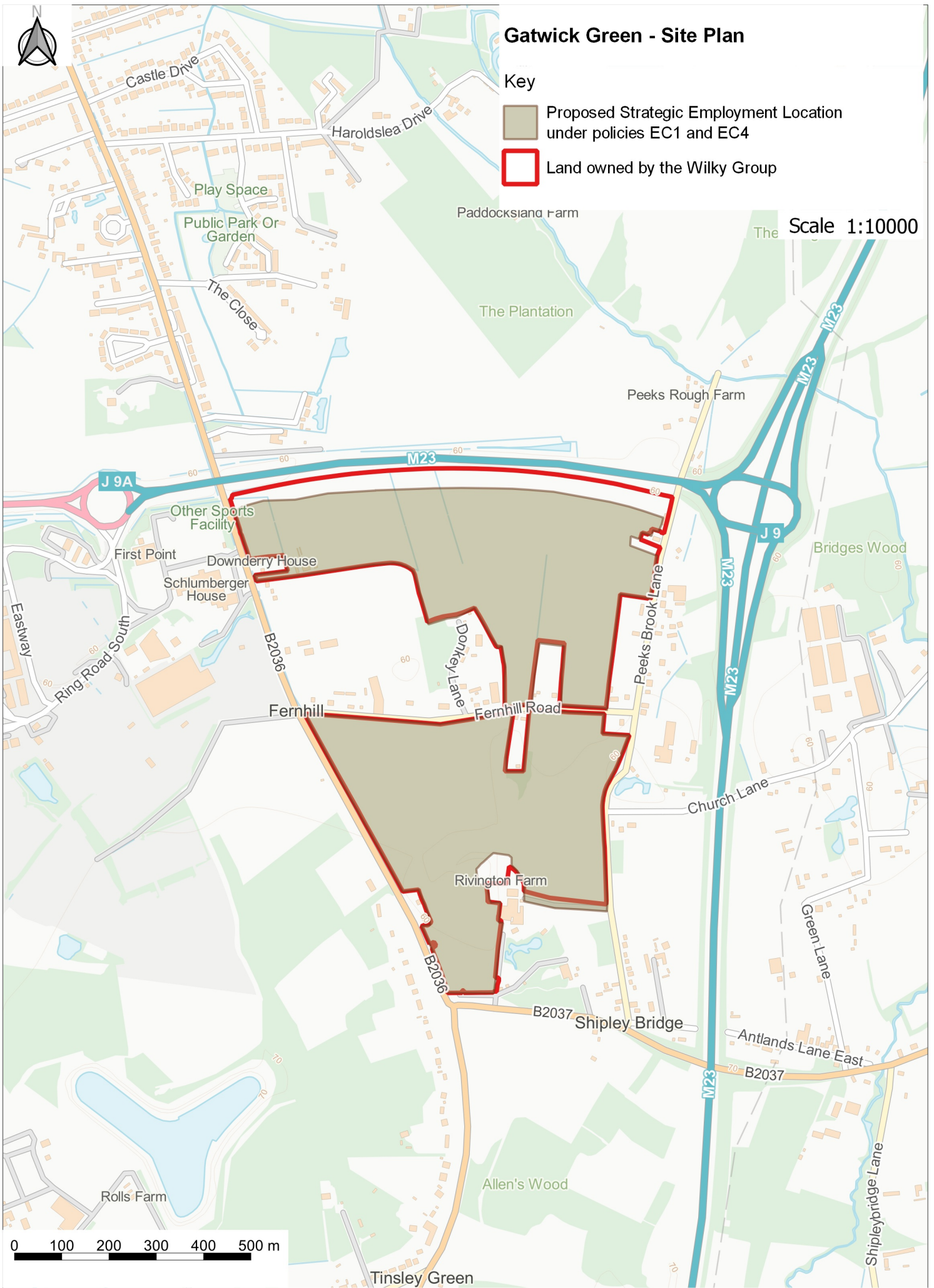


Gatwick Green - Site Plan

Key

-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group

Scale 1:10000



Appendix D - Addendum: Landscape Character & Visual Appraisal



Landscape Addendum

(To the Landscape Character & Visual Appraisal of January 2020)

Gatwick Green, Land off Balcombe Road & Fernhill Road, Crawley

Prepared on behalf of:
The Wilky Group

Ref: 2893-RE-02C-DACR

Date: June 2021

GATWICK GREEN, LAND OFF BALCOMBE ROAD & FERNHILL ROAD, CRAWLEY
ADDENDUM TO THE LANDSCAPE CHARACTER & VISUAL IMPACT ASSESSMENT

1. INTRODUCTION

- 1.1 This document has been prepared by landscape consultants Allen Pyke Associates (APA) to update, and identify, any changes to the baseline information and result conclusions reached in their report entitled 'Landscape Character and Visual Appraisal: Gatwick Green, Land off Balcombe Road & Fernhill Road, Crawley' dated January 2020 (2020 LCVA) produced on behalf of the Wilky Group (TWG).
- 1.2 TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area. The site extends to about 47 ha (116 acres) of land east of Gatwick Airport - the site known as Gatwick Green (as shown on the plan at **Appendix 1**). The Site is proposed for allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) and is identified under Policy EC1 and Policy EC4 as an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green provides for a minimum of 24.1 ha of industrial development.
- 1.3 The 2020 LCVA provided an assessment of the landscape and visual considerations relating to the Site to inform the promotion of Gatwick Green for employment purposes. The 2020 version of the DCBLP identified the Site as part of a wider area proposed for an Area Action Plan (AAP) to address the Borough's future urban growth and community needs alongside the future needs of Gatwick Airport.
- 1.4 The basis for this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. TWG is now promoting a development for predominately storage and distribution uses in line with policies EC1 and EC4 of the DCBLP.
- 1.5 Based on the changed planning policy status of the site, APA has reviewed the scope and nature of the landscape and visual investigations/surveys undertaken for the 2020 LCVA, which was informed by survey work undertaken in November 2019. The original baseline landscape studies covered broadly the same area of land now being proposed as an allocation. APA confirms that the survey work remains up to date. Consequently, the conclusions and recommendations in the 2020 LCVA remain valid as a basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. The 2020 LCVA, supplemented by this Addendum, therefore remains a valid part of TWG's evidence base for their DCBLP submissions.

2. CHANGE IN PLANNING POLICY

Change in Policy between the 2020 and 2021 Regulation 19 DCBLP

- 2.1 The 2020 Regulation 19 DCBLP removed blanket safeguarding for the additional wide-spaced runway at Gatwick Airport, replacing it with a commitment to prepare an Area Action Plan (AAP) under Policy SD3 over the former safeguarded land and within which a temporary safeguarding arrangement was proposed.
- 2.2 The AAP would have been advanced via a separate Development Plan Document to address Crawley's unmet needs for employment, housing and community uses alongside any legitimate long term development needs of Gatwick Airport. Following advice from the Planning Inspectorate, the Council revised its strategy by reviewing the extent of safeguarding, which in turn allowed the identification of a Strategic Employment Location at Gatwick Green.
- 2.3 The 2021 Regulation 19 DCBLP therefore allocates Gatwick Green as an industrial-led development site under policies EC1 and EC4, with safeguarded land retained outside the allocation to accommodate an additional wide-spaced runway and associated airport infrastructure.

New Crawley BC Policy Framework

- 2.4 Gatwick Green is allocated as an industrial-led Strategic Employment Location for a minimum of 24.1 hectares under policies EC1 and EC4.
- 2.5 Policy EC4 makes provision for additional industrial land beyond this amount. Limited complementary ancillary uses, such as offices and small scale convenience retail and leisure facilities, may be included where they would support the industrial-led function.
- 2.6 Policy EC4 goes on to set out a range of development management provisions, such as access, sustainable design and construction, character and design, and arrangements for delivery. These provisions establish the scope and nature of the associated infrastructure requirements and environmental considerations, which combined with other policies in the DCBLP to ensure the site is developed in a sustainable manner.

3. METHODOLOGY

- 3.1 The methodology used for the review in this Addendum follows the same principles as those used in the 2020 LCVA. These are taken from the recognised Landscape Institute & IEMA publication 'Guidelines for Landscape & Visual Impact Assessment, 3rd Edition of 2013 (GLVIA3).

4. REVISED PROPOSALS

- 4.1 The amended proposals and development principles are broadly similar to those assessed in the 2020 LCVA. The principal difference being the substitution of a mixed B1,B2, B8 development for a scheme consisting predominantly of B8 units.

5. LANDSCAPE & OTHER CONSIDERATIONS

Landscape Character & Visual Amenity [LCVA 3.34 to 3.49]

- 5.1 The overall massing of the storage and distribution units within the site will be similar for the surrounding visual receptors and other viewpoints identified in the 2020 LCVA. The only significant change will be more uniform building heights compared to the mixed business proposal TWG promoted via its Reg 19 representations to the DCBLP 2020. The 2020 LCVA therefore considered a greater potential range in unit heights that included landmark buildings of greater height.

- 5.2 The more uniform building heights will assist the landscape mitigation principles recommended in the 2020 LVCA [4.1 to 4.7] and bring forward the effectiveness of the screening proposals and assimilation of the development into the landscape. Therefore, the new proposals will have no greater visual impact on the neighbouring visual receptors or impact on the character of the various adjacent rural and urban landscapes.

Landscape Designations [LVIA 3.26 to 3.28]

- 5.3 The 2020 LCVA demonstrated that the site was not subject to any statutory or local landscape designations, that it was located outside the London Metropolitan Green Belt but was identified as a Biodiversity Opportunity Area. These circumstances remain unchanged in April 2021.

Local Planning Policies [LCVA 3.16 to 3.25]

- 5.4 The landscape related planning policies in the adopted and emerging Local Plans identified in the 2020 LCVA have not changed and the conclusions reached on these policies therefore remain valid.

6. CONCLUSION



- 6.1 The landscape and visual conclusions and recommendations included in the 2020 LCVA [5.1 to 5.17] remain valid as a basis for consideration of the proposed allocation of Gatwick Green in the DCBLP and, with the support of this Addendum, remain a valid part of the TWG evidence base for their DCBLP submissions.

APPENDIX 1

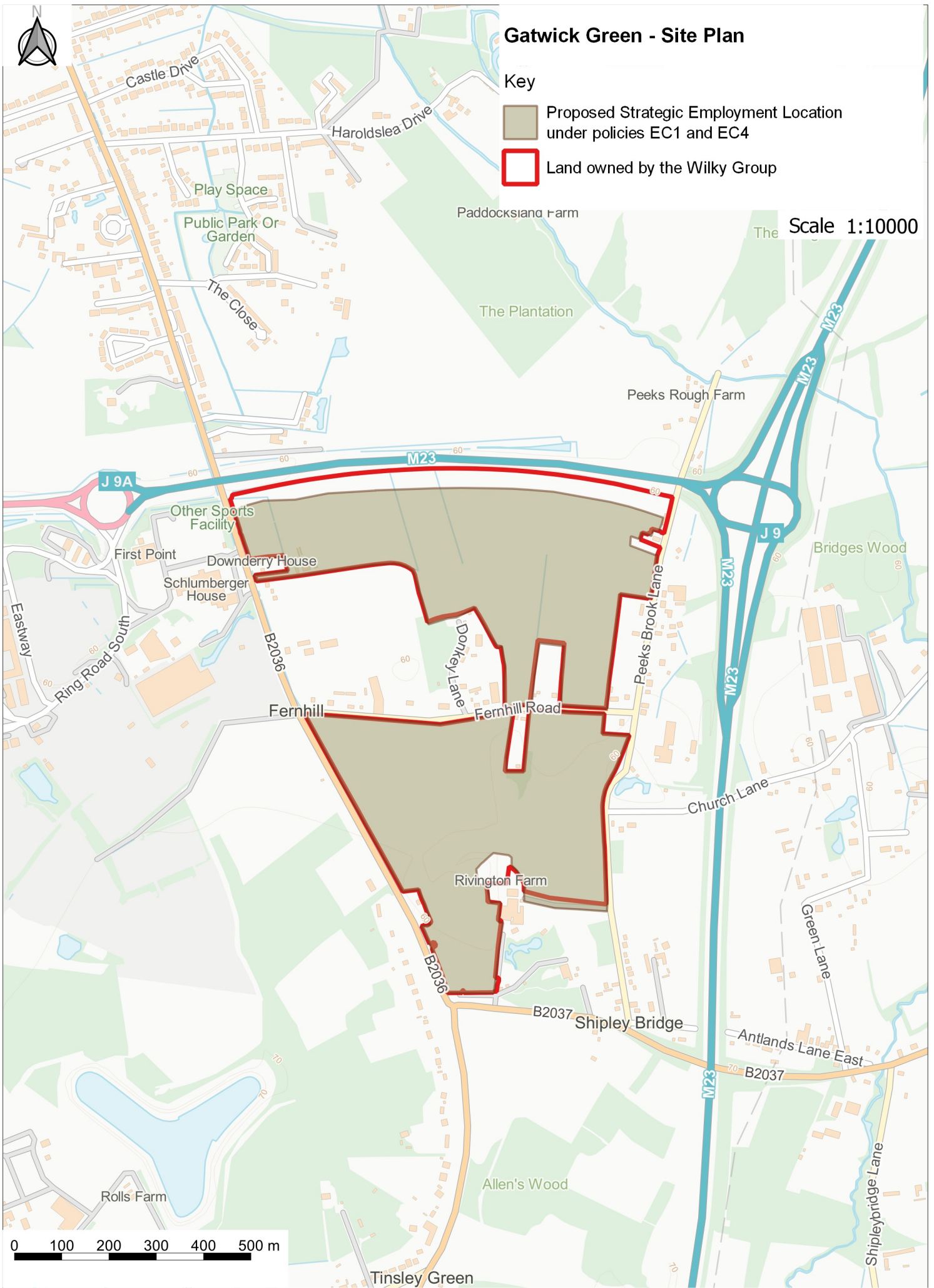


Gatwick Green - Site Plan

Key

-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group

Scale 1:10000



Appendix E - Addendum: Heritage Constraints Appraisal

Gatwick Green

Heritage Constraints Appraisal Addendum



Gatwick Green
Heritage Constraints Appraisal Addendum



Project: Gatwick Green - Heritage Constraints Appraisal Addendum

Client: The Wilky Group Limited

Revision: 002 (Second issue – following client comments)

File Origin: 2. National\West Sussex\Gatwick Green

Document Checking:

Prepared by: Harry Clarke
Associate, Heritage Planning

Signed:

A handwritten signature in black ink, appearing to be "H Clarke".

Approved by: Juan Jose Sarralde, PhD
Associate Director, Heritage Planning

Signed:

A handwritten signature in black ink, appearing to be "JJSarralde".

Contents

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2.0	Planning context	- 6 -
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Abbreviations and Conventions used in the text		
c.	circa	km kilometres
CA	Conservation Area	LB Listed Building
ha	hectares	LPA Local Planning Authority
HA	Heritage Asset	m metres
HE	Historic England	NGR National Grid Reference
HER	Historic Environment Record	NHLE National Heritage List for England
		NPPG National Planning Practice Guidance
		NPPF National Planning Policy Framework

Assumptions and Limitations

This report is compiled using primary and secondary information derived from a variety of sources, only some of which have been directly examined. The assumption is made that this data, as well as that derived from other secondary sources, is reasonably accurate.

Compliance

This document has been prepared in accordance with the requirements stated within the National Planning Policy Framework (NPPF; (Ministry of Housing, Communities & Local Government, 2019) National Planning Practice Guidance (NPPG; (Ministry of Housing, Communities & Local Government, 2019) and the Chartered Institute for Archaeologists' Standard and guidance for historic environment desk-based assessment, and Standard and guidance for commissioning work on, or providing consultancy advice on, archaeology and the historic environment (Chartered Institute for Archaeologists, December 2017).

1.0 Project background

- 1.1.1 Savills Heritage and Townscape was commissioned by The Wilky Group Limited to carry out a Heritage Constraints Appraisal (HCA) in regard to the potential development of a Site at Gatwick Green, Crawley.
- 1.1.2 This Note is an Addendum to the report by Savills Heritage entitled 'Gatwick Green: Heritage Constraints Appraisal' dated January 2020 (2020 HCA) on behalf of The Wilky Group (TWG). TWG has a long-standing interest in the promotion of strategic employment land within the Crawley Borough Council (CBC) area; a site known as Gatwick Green. The original HCA constituted a preliminary scoping report for the client, outlining the likely considerations to future scheme options in terms of buried heritage assets (archaeological remains) and above ground assets (standing buildings of historic interest and their setting). Such assets, whether designated or not, are afforded protection and can represent a planning constraint to future development.
- 1.1.3 TWG owns about 47 ha (116 acres) of land east of Gatwick Airport as shown on the plan attached to this Addendum (along with the original HCA). The Site is a proposed allocation as a Strategic Employment Location (SEL) in the draft Crawley Borough Local Plan, January 2021 (DCBLP) under Policy EC1 and Policy EC4 for an industrial-led scheme, predominantly for B8 use (strategic storage and distribution). The extent of the allocation for Gatwick Green is identified on the attached plan – it provides for a minimum of 24.1 ha of industrial development.
- 1.1.4 The 2020 HCA provided an assessment of the hedgerows on the Site to inform its promotion for employment purposes by TWG. The 2020 version of the DCBLP identified the Site as part of a wider area proposed for an Area Action Plan (AAP) to address future urban growth and community needs alongside the future needs of Gatwick Airport. This Addendum provides an update to the 2020 HCA in response to the changed planning policy status of the Site, being its proposed allocation for employment development in the DCBLP.
- 1.1.5 The basis of this Addendum is the revised planning status of the Site under the DCBLP as compared to the policy framework in the January 2020 version of the Plan and what was being promoted by TWG at that time. TWG is now promoting a development for predominately storage and distribution uses in line with policies EC1 and EC4 of the DCBLP.

2.0 Planning context

- 2.1.1 The Site is located in West Sussex, in the borough of Crawley (and the current local planning policy context is covered in Appendix 1: Section 5.3 of the original HCA). The Development Plan for the area containing the Site comprises the adopted Crawley Borough Local Plan 2015 (CBLP), the Joint Minerals Local Plan (JMLP, July 2018) and the Waste Local Plan (WLP, April 2014).
- 2.1.2 The purpose of this Heritage Constraints Appraisal Addendum is to review the findings of the original Appraisal (Savills 2020) and report on whether the recommendation remain valid in the context of the Site's revised planning policy status as a proposed allocation for industrial uses, predominately B8 (storage and distribution).
- 2.1.3 The Reg 19 Draft Crawley Local Plan Regulation 19 consultation has been extended to 30 June 2021 and includes the following Strategic Policy in relation to Heritage Assets, which is reproduced in full below:

Strategic Policy HA1: Heritage Assets

Crawley's designated and non-designated heritage assets include:

- *Listed Buildings (see also Policy HA4);*
- *Scheduled Monuments (see also Policy HA7);*
- *Non-designated archaeological assets of equivalent significance to scheduled monuments (see also Policy HA7);*
- *Conservation Areas (see also Policy HA2);*
- *Locally Listed Buildings (see also Policy HA5)*
- *Areas of Special Local Character (see also Policy HA3);*
- *Historic Parks and Gardens (see also Policy HA6);*
- *Other non-designated assets with archaeological interest (see also Policy HA7).*

All development should respond to these as a finite resource, providing a distinctive combination of social, economic and environmental benefits. Proposals should seek to ensure that heritage assets' key features or significance are conserved and enhanced as a result of development.

Where a designated heritage asset is affected by a proposal, great weight will be given to its conservation, while harm to, or loss of, its significance will require justification according to the importance of the asset and the degree of loss or harm, in line with local and national policy.

Proposals affecting the significance of a non-designated heritage asset will be considered according to the scale of any harm or loss, and the asset's significance, in line with local and national policy. Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be required. This should:

- i. for development proposals meeting criteria set out in the council's Local List of Planning Requirements: include, and be informed by, the findings of a search of the Historic Environment Record (HER) and/or an Archaeological Desk-based Assessment;*
- ii. in all cases: describe, with reference to relevant sources (such as the National Heritage List for England and Conservation Area Appraisals), the significance of any heritage assets affected and the contribution made by their setting, the impact of the development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated.*

The loss or replacement of a heritage asset may be appropriate in exceptional circumstances, where justified in line with local and national policy on loss or harm, and where it has been demonstrated that:

- the site is essential to the development's success;*
- the benefits of the entire scheme outweigh the loss of the asset; and*
- any replacement scheme makes an equal contribution to local character and distinctiveness.*

In cases where a heritage asset is considered to be suitable for loss or replacement in accordance with local and national policy, and it has been demonstrated that its site is essential to the development's success, proposals will be subject to a requirement to record the asset(s) concerned. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the council in advance of its implementation and will reflect the importance and nature of the asset and the impact of the proposal.

Applicants in such cases will also be required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record. 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 will be encouraged.

2.1.4 The key heritage constraint on the Site is the Grade II statutory listed buildings (Old House and Lilac House), and the effects development might have on the setting of these building. The proposals must be sensitive to the context of the setting of the listed buildings in line with local and national policy and historic England guidance on setting.

2.1.5 In regards to archaeological remains here may be below-ground non-designated heritage assets associated with the previous historic farmsteads (which are visible on the historic OS maps). The LPA archaeological advisor is likely to require site based archaeological fieldwork, dependant on the

expected scheme impacts, in order to identify the nature and extent of any below ground non-designated heritage assets.

2.1.6 Also of relevance is Crawley Borough Council's recent consultation on 'Conservation areas and locally listed buildings', which is reflected in the Council's Heritage Assets Review, which forms part of the evidence base to the DCBLP. Overall, the Council propose to update the Local Heritage List (locally listed buildings) by the inclusion of around 60 additional buildings and the removal of 2 buildings currently on the list. The changes to Conservation Areas were not relevant to Gatwick Green. There are two locally listed buildings in Appendix A of the Heritage Assets Review which were not included in the explicit 'scoping out' of locally listed buildings in the 2020 HCA - these assets are some distance from the site and not considered to be relevant. However, there is one additional locally listed building which was not addressed in the 'scoping out' of locally listed buildings in the 2020 HCA because it wasn't listed at that time, namely Hamon Lodge (associated with Burstow Hall and north of Antlands Lane). Insofar as Burstow Hall was 'scoped out' in the 2020 HCA, the same would apply to the Lodge. Furthermore, Toovies Cottage, which was 'scoped out' in the 2020 HCA (as being too far from the site), has now been removed from the list of locally listed buildings.

2.1.7 There are no identified Areas of Special Local Character (Policy HA2) or conservation areas (Policy HA3) within the vicinity of the site, however, Policy HA4 concerns listed buildings and is reproduced in full below:

Policy HA4: Listed Buildings and Structures

To recognise the value of Listed Buildings (including Listed Structures) within Crawley, the council will ensure that any proposed works to them are consistent with the character, appearance and heritage interest of any statutory Listed Building/Structure, in line with national legislation, policy and guidance.

Any changes must preserve or enhance the design and character of the Listed Building and have regard to its historic and architectural significance. A Heritage Impact Assessment is required to be submitted demonstrating how proposals will protect the significance of the listed building, including its setting and its key features. Harm to, or loss of, the significance of a Listed Building will require clear and convincing justification, taking account of the grading of the building, and the degree of harm or loss, in line with national policy.

Substantial harm to, or total loss of, the significance of a Listed Building will require exceptional justification, including benefits that outweigh the harm or loss, and further demonstration of either:

a. the public and substantial nature of the benefits concerned; or,

b. the absence of an alternative use which averts the loss or harm and is consistent with:

- i. the nature of the Listed Building; or*
- ii. medium-term viability; or*
- iii. the extent of potential opportunities for grant-funding, or not-for-profit ownership.*

In cases where substantial loss or harm is justified, the council will require the building to have been recorded according to an agreed scheme of investigation which is proportionate to the importance of the Listed Building and the impact of the proposal. The record shall be submitted to the Historic Environment Record. Any development on the site of a demolished Listed Building must have regard to the character, form and heritage significance of the original building.

Development proposals involving ground works adjacent to or within the curtilage of a Listed Building will also need to respond to the site's archaeological potential in accordance with Policy HA7.

- 2.1.8 The LPA is likely to require a Heritage Statement as part of a planning application (the DCBLP refers to this as a Heritage Impact Assessment). The Heritage Statement will provide a detailed understanding of the heritage significance of the assets and assess the impact of the proposed scheme on that significance.
- 2.1.9 It is anticipated that the forthcoming development proposals will not physically impact any known built heritage assets, either statutory listed buildings or locally listed buildings. Therefore it is judged that the only potential development impact to the identified assets will be to a change in their setting. Upon reviewing the significance of heritage assets in the vicinity of the site based on statutory designation the key heritage constraint on the Site is the Grade II statutory listed buildings (Old House and Lilac House), and the effects development might have on the setting of these buildings.
- 2.1.10 Following the policy regarding listed buildings, Policy HA5 concerns locally listed buildings and is reproduced below:

Policy HA5: Locally Listed Buildings

All development will seek to secure the retention of Locally Listed Buildings. Development should also maintain features of interest, and respect or preserve the character or setting of the building.

Development proposals affecting a Locally Listed Building must demonstrate in the Heritage Impact Assessment that the proposals take account of its heritage significance, including its setting and any heritage interest falling within the following categories:

- i) Age;*
- ii) Authenticity;*
- iii) Aesthetic/Architectural Value;*

- iv) Historic Value;*
- v) Social/communal Value;*
- vi) Group Value;*
- vii) Landmark/Townscape Value;*
- viii) Archaeological Interest.*

Proposals seeking the demolition or partial demolition of a Locally Listed Building 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.*

If demolition is seen to be acceptable, the building must first be recorded according to an agreed scheme of investigation which is proportionate to the importance of the Locally Listed Building and the impact of the proposal. The record must be submitted to the Historic Environment Record in consultation with the Local Authority.

- 2.1.11 There are several locally listed buildings in the immediate vicinity of the Site. Local listing is a way of acknowledging to owners and decision makers that the building is of value to the local scene, character or history. Whilst this designation holds less heritage significance than statutorily listed buildings it can nevertheless represent a constraint to future development.
- 2.1.12 The DCBLP states, in relation to locally listed buildings that “*take account of its heritage significance, including its setting and any heritage interest*”. Any forthcoming Heritage Statement (or Heritage Impact Assessment) must demonstrate that any proposed development has taken into account the historic, architectural, townscape and communal interest of any buildings that are likely to be affected (in line with DCBLP HA4).
- 2.1.13 There are no historic parks or gardens within the vicinity of the site (Policy HA6: Historic Parks and Gardens). However the site does have potential for remains of archaeological interest to be present below ground. Policy HA7 of the DCBLP relates to archaeological remains.

Policy HA7: Heritage Assets of Archaeological Interest

Development proposals in the vicinity of a Scheduled Monument, or any heritage asset with archaeological interest which is demonstrably of equivalent significance (i.e. 'designated' archaeological assets), will be expected to preserve or enhance the asset and its setting, including through the protection of the asset from disturbance associated with development activity, and through the avoidance of patterns of movement or land use which may cause harm to, or loss of, the significance of an asset over time. Development should identify and pursue opportunities to better reveal the significance of such assets.

Development proposals affecting designated archaeological assets should be supported by a Heritage Impact Assessment demonstrating an understanding of the asset's significance, and how this has informed compliance with the requirements identified above.

Any harm to, or loss of, the significance of any designated or non-designated archaeological heritage asset involved in a development proposal will be considered in line with national and local policy, according to the significance of the asset and the degree of loss or harm.

This consideration will extend to cover heritage assets which are identified, or whose significance is re-evaluated, during the planning and development processes. In order to facilitate this, applications meeting the following thresholds should be supported by an Archaeological Desk-Based Assessment:

- *ground works adjacent to or in the curtilage of a Listed Building;*
- *any activity within a Scheduled Monument;*
- *ground works within a Red Archaeological Notification Area;*
- *five or more residential units OR non-residential/mixed use development of over 0.2ha within an Amber Archaeological Notification Area;*
- *development outside an Archaeological Notification Area comprising 10 or more new units OR over 0.5ha of non-residential/mixed use development.*

Subject to the findings of a Desk-Based Assessment, the council may require field evaluation and the recording and publication of results. In some cases, the council may require assets to be preserved in situ or excavated.

2.1.14 No past archaeological investigations have been carried out within the Site and a total of seven archaeological investigations have been conducted within the study area, comprising both desk-based assessments along with archaeological fieldwork investigations. Having assessed the Historic Environment Record (HER) data it is considered that there is a low archaeological potential within the Site for buried remains dating from the prehistoric period to be present.

2.1.15 Through the assessment of previous archaeological investigations in the vicinity of the Site, it is deemed there is a moderate potential for Romano-British to post-medieval remains to be present, these are likely to comprise agricultural features which would only be of minor local significance. Overall these investigations in the vicinity of the site highlight varying levels of archaeological potential and it is

possible that finds of a later date may also be located within the proposed development area, possibly associated with the previous historic farmsteads (which are visible on the historic OS maps).

- 2.1.16 The LPA archaeological advisor is likely to require an full Archaeological Desk-based Assessment (ADBA) as part of a planning application. Moreover, due to the Site being located in a recognised historic landscape, the local authority may require an archaeological fieldwork evaluation which would assess the below ground potential for archaeological remains. Any archaeological work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be carried out under the terms of a staged archaeological planning condition set out under the granting of planning consent.

3.0 Conclusion

3.1.1 This addendum confirms the overall conclusions and recommendations of the original HCA which has identified the key heritage considerations for the site in line with the DCBLP policies. The original HCA concluded that:

“There are two statutory listed buildings within the Site (Lilac cottage and Old cottage), there are several locally listed buildings in the immediate vicinity of the Site. The Historic Environment Record (HER) identifies several historic farmsteads to the south of the Site which may constitute undesignated heritage assets.

The statutory listed buildings of Lilac cottage and Old cottage are predominantly surrounded by mature vegetation with limited views looking south west across the open land to the north east. The locally listed buildings of the Poplars and Royal Oak House are also surrounded by mature vegetation; these assets have less weight in planning decisions than statutory protected assets, but nonetheless remain a consideration.

It is anticipated that future development would not materially impact these assets. However, any future development proposals would have to be sensitive to the setting of the statutory listed buildings as well as the Locally listed buildings in close proximity to the development area. The LPA may view the agricultural land surrounding these assets as a contributor to their significance.”

3.1.2 Embedded design mitigation is expected to be incorporated around and throughout the development and it is considered that any perceived harm to heritage significance via a change in setting of these statutory and locally listed buildings could be avoided or minimised by the subsequent detailed design, or outweighed by the public benefits of the scheme (in line with the NPPF).

3.1.3 Furthermore, in regards to archaeological considerations the original Appraisal concluded that :

“due to the Site being located in a recognised historic landscape, the local authority may require an archaeological fieldwork evaluation which would assess the below ground potential for archaeological remains.

It is proposed that any archaeological work would need to be undertaken in accordance with an approved Written Scheme of Investigation (WSI) and could be carried out under the terms of a staged archaeological planning condition set out under the granting of planning consent.”

3.1.4 As the Site is located in a recognised historic agricultural landscape, the local authority may require a preliminary archaeological evaluation of the Site, which would further assess the below ground potential for archaeological remains.

3.1.5 Overall, the LPA is likely to require a Heritage Statement (Heritage Impact Assessment) and a full Archaeological Desk-based Assessment as part of a planning application. An archaeological field



evaluation may be required by the LPA pre-determination of a planning application, but this will be based on the results of the full Archaeological Desk-based Assessment and will be the decision of the local authority archaeological advisors.

- 3.1.6 In regards to the DCBLP, the findings and recommendations of the original HCA remain valid in the context of the proposed consultation changes. The revisions to Conservation Areas are not within the vicinity of the Site and the locally listed buildings have already been captured in the 2020 HCA.
- 3.1.7 Savills Heritage and Townscape has reviewed its 2020 HCA in the context of the changed planning policy status of the site and the recent revisions contained in the Council's Heritage Assets Review. The 2020 HCA was informed by desk-based investigations undertaken in November 2019: the investigations covered broadly the same area of land now being proposed as an allocation. Savills Heritage confirms that the investigations in the 2020 HCA, updated in this Addendum with respect to the Heritage Assets Review, result in no changes to the findings and recommendations in the 2020 HCA.
- 3.1.8 The 2020 HCA therefore remains a valid basis for the consideration of the proposed allocation of Gatwick Green in the DCBLP though the forthcoming Examination. Consequently, the 2020 HCA remains a valid part of TWG's evidence base and that of the DCBLP, supplemented by this Addendum.

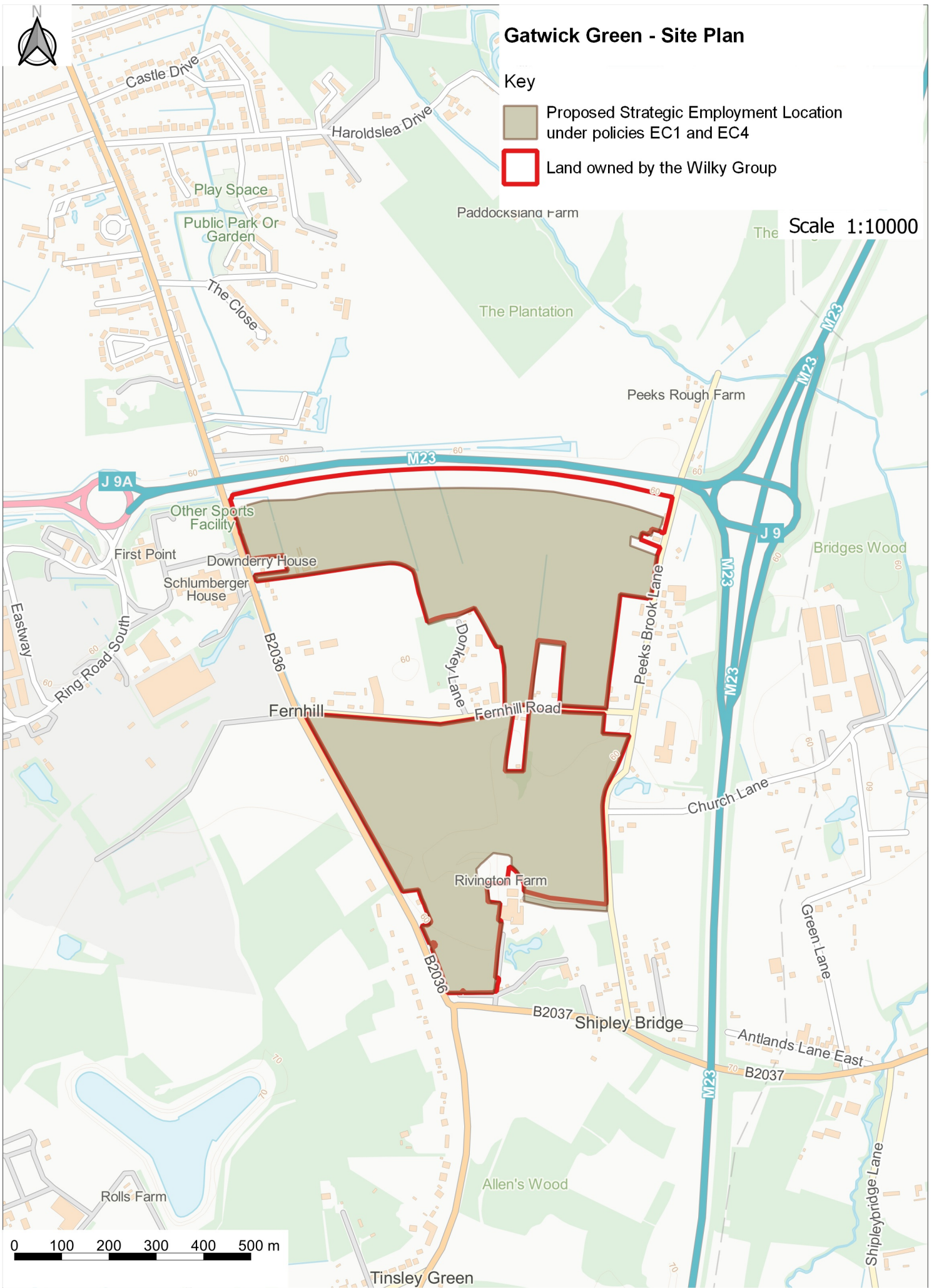


Gatwick Green - Site Plan

Key

-  Proposed Strategic Employment Location under policies EC1 and EC4
-  Land owned by the Wilky Group

Scale 1:10000





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33 Margaret Street
London
W1G 0JD