



Planning Policy

By email to strategic.planning@ Crawley.gov.uk

Our Ref: CLP/2023

Date: 20 June 2023

Dear Strategic Planning,

Reigate & Banstead Borough Council response to Crawley 2040 – Local Plan Review – Regulation 19 Submission Version Local Plan and supporting evidence

Thank you for providing Reigate and Banstead Borough Council the opportunity to comment on the Regulation 19 Crawley Submission Version Local Plan 2024 – 2040 (February 2023). We previously submitted our response to the Regulation 19 Crawley Borough Local Plan 2021-2037 (January 2021), and associated key documents on the 30th June 2021. We will therefore focus this response on the new changes since then, on the understanding that our response to the previous Regulation 19 consultation will be submitted in full, to the Secretary of State for the Local Plan's examination, along with responses received in this consultation. We would also like to note that we submitted our Duty to Cooperate ("DtC") response to the Draft Duty to Cooperate Statement on 28th April 2023.

Unmet Housing Need

Reigate and Banstead Borough Council ("RBBC") note that Crawley Borough Council ("CBC") will have an unmet housing need of approximately 7,050 dwellings over the Plan period. As mentioned in our recent Draft Duty to Cooperate Statement response, our borough operates in a different housing market to CBC. RBBC operate wholly in the East Surrey housing market and as per our agreement in our most recent Statement of Common Ground (2021), we are not in a position to meet any of CBC's unmet housing need.

Policy EC4 and Economic Growth

CBC's Local Plan for sustainable economic growth is based on the 2022 Experian Baseline Growth forecast of a minimum 113,390sqm (26.2ha) business land over the period to 2040. It is understood that this is reflected in the updated scenarios highlighted in the Northern West Sussex Economic Growth Assessment Supplementary Update for Crawley (January 2023). Using the Experian analysis and the updated scenarios, there is set to be sufficient land for office uses, but a shortfall for industrial. In addition to new office land coming forward in Crawley, the Horley Strategic Business Park site allocation (RBBC Development Management Plan Policy HOR9) will add to the sub-regional office offer. Therefore, it is known that Crawley's employment land requirements are mostly for industrial and in relation to B8 storage & distribution use.

The constraints for employment land availability are understood to be heavily impacted by Gatwick Airport safeguarded land for a potential future southern runway. The land referred to as 'Gatwick Green' is promoted for employment use, located east of Gatwick Airport and the safeguarding of such land is not deemed to be appropriate for Gatwick's plans of surface car parking. CBC's Local Plan retains safeguarding but amends its boundary to exclude land to the east of Balcombe Road and south of the M23 spur for the Gatwick Green allocation, predominantly for B8 use class. The employment use is thought to address the industrial sector shortage which is not comprehensively catered for in the Manor Royal allocation (Policy EC3). It is also understood to complement the office-led provision provided by RBBC's Horley Business Park. Reigate and Banstead Borough Council support the reasons for the allocation in this regard.

Strategic Policy EC4: Strategic Employment Location refers to the Gatwick Green scheme promoted to CBC by Savills on behalf of Wilky Group. The scheme shows two points of primary vehicular site access off Balcombe Road. As mentioned in our previous response, we strongly support the proposed restrictions on HGV's access/egress junctions at Gatwick Green. We very much welcome the additional wording in Policy EC4 criterion d. that states:

"HGV traffic will not be allowed to enter Gatwick Green from the north on Balcombe Road, and will not be allowed to egress the site via a right turn onto Balcombe Road."

This additional requirement will mitigate the adverse impacts on Balcombe Road, and therefore we feel it is found to be sound. We also welcome the new requirements set out in criteria e. and m., which further strengthen the policy.

Sustainability Appraisal / Strategic Environmental Assessment

In our previous response (dated 30th June 2021) we expressed concern that the CBC draft Sustainability Appraisal (“SA”) fails on the grounds of legal compliance. The Council determined that for the proposed allocation Gatwick Green, an option for not allocating land to meet the identified B8 need was not addressed. Having further assessed the most recent draft SA (May 2023), Appendix F: Submission Local Plan Spatial Strategy Options and Appraisal, we note that this has been addressed under the overarching spatial policy EC1: Sustainable Economic Growth. Option 1 is for the reliance on the NPPF to ensure that identified economic growth is directed to the most appropriate and sustainable locations. This is deemed as not directly allocating land and therefore we view this as addressing the option of not allocating land to meet B8 usage need. As a result, we would like to withdraw our previously written statement on the SA in our previous response and we no longer find any issues on legal compliance in this case.

Habitat Regulation Assessment

We welcome the updated Habitat Regulation Assessment Report (January 2023) which builds upon the draft 2021 Report. We note that the Appropriate Assessment (“AA”) for the Mole Gap to Reigate Escarpment, Special Area of Conservation (“SAC”) for Air Quality and Water is complete. We previously raised concerns about the Nitrogen levels, and we note that the new AA explores the impacts to the SAC. Table 9.2 shows that:

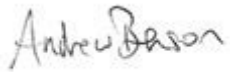
“The nitrogen deposition levels associated with emissions from traffic on the A217 from the Local Plan alone at roadside are between 0.44kg /N/ha/yr and 0.69kg /N/ha/yr at the closest point to the SAC”

This is said to be a slight increase in nitrogen deposition on the A217 (between 0.14 and 3kg N/ha/yr), whilst overall there is a reduction in the total level of nitrogen in the future scenarios. All the future scenarios modelled show an improvement in nitrogen deposition concentrations and the conclusion is that there is no Adverse Impact on Site Integrity (AIOSI). When considering water impacts too, it is stated that the Local Plan will have no AIOSI either alone or in combination at the Mole Gap to Reigate Escarpment SAC.

Conclusion

We hope that you find these comments helpful. Should you have any queries, please do not hesitate to contact us. We look forward to continue working together going forward.

Yours faithfully,

A handwritten signature in black ink that reads "Andrew Benson". The signature is written in a cursive style with a large initial 'A'.

Andrew Benson

Head of Planning