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Delivered by email (strategic.planning@ Crawley.gov.uk)

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

Ref: A2DS3001

Dear Sir / Madam

REPRESENTATIONS TO CRAWLEY BC REGULATION 19 DRAFT LOCAL PLAN ON BEHALF OF A2DOMINION

We write on behalf of our client, A2Dominion, to set out representations on the Regulation 19 draft Local Plan for Crawley Borough.

A2DOMINION

A2Dominion is a housing provider with a social purpose and builder of award-winning affordable, private and social-rented homes. They pursue their business with a social purpose, reinvesting profits from private sales into building new affordable homes, managing existing homes and supporting local communities. They deliver on all tenures on their development sites, retaining a long term interest via the ownership and management the affordable housing and open areas.

A2Dominion's vision is to improve people's lives through high-quality homes and services. A2Dominion has over 39,293 homes across London and southern England and are committed to developing new homes that are genuinely sustainable.

A2Dominion have led the development of a new flagship eco town at North West Bicester; a pioneering project backed by environmental integrity and a long-term vision for the area.

COTTESMORE VILLAGE

A2Dominion has recently promoted an area of land to the west of Pease Pottage for residential development to Mid Sussex District Council. A2Dominion has provided details to Horsham District Council of a wider opportunity referred to as 'Cottesmore Village' where the vision is for a sustainable new community located in close proximity to Crawley.

The site is circa 83ha, and is currently in use as Cottesmore Hotel and Country Club. Due to the recent decline in Golf the site opens up a new opportunity to create a sustainable community incorporating the existing Hotel and

The Pinnacle
20 Tudor Road
Reading
RG1 1NH

T 0118 902 2830 turley.co.uk

Country Club, open space, community sports facilities and business hub within a landscaped setting. The site can be separated into two areas of land connected by a pedestrian footpath. Current access into the site is taken from Forest Road to the south, where the current Club main facilities are located including a Club House, Hotel and Spa.

Cottesmore Village is in a strategically significant location on the edge of the major urban area of Crawley (and its range of facilities, employment opportunities and transport connections), close to the strategic highway network and within the 'Gatwick Diamond' which has followed from the consistent recognition of this area's importance in regional planning.

The interaction between Horsham District and Crawley was acknowledged in the HDPF which states explains how the 2001 Census showed 40% of working people who live in Horsham District commute outside it to work. Of these, 58% travelled to Crawley and London. The HDPF also explains how the District has been recognised as operating at a pivotal point of a triangle of large urban communities between Crawley/Gatwick and Portsmouth and Brighton on the south coast.

A number of local authorities in the area (Surrey County Council, West Sussex County Council, Crawley Borough Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Tandridge District Council) have formed the Gatwick Diamond local authorities. The Authorities published a Gatwick Diamond Local Strategic Statement in 2012, with an updated version published in June 2017. A Memorandum of Understanding (MoU) exists between the Gatwick Diamond authorities as a mechanism for interauthority co-operation to promote the planning of sustainable development across the area. The Local Strategic Statement from 2017 explains that the Vision to 2031 is "By 2031 the Gatwick Diamond will be a worldclass, internationally recognised business location achieving sustainable prosperity and growth."

A2Dominion consider that these considerations, allied with the significant unmet housing need arising from within Crawley Borough reinforce the strategic location of the area and the role in which Cottesmore Village could play.

The work undertaken by A2Dominion demonstrates that Cottesmore Village could provide:

- Residential areas totalling circa 19.67ha across the site. There will be differing character areas to each parcel with lower densities around the development edge and set back from a listed building adjoining the site. All residential development is within a landscape country park setting respecting the natural character of the site;
- A local centre, which could include uses such as a doctors' surgery, community hall, coffee shop, convenience store and Business and Innovation Hub including a delivery hub as we change to online shopping more and other facilities subject to detailed masterplanning;
- A primary school;
- Sports/play pitches;
- A community food production area; and
- Significant levels of open space.

Vehicular access to the site is proposed from Forest Road via a new roundabout junction.

Cottesmore Village will bring forward new facilities to offer new and existing residents much greater opportunity to travel locally on foot and by bicycle. The emerging masterplan shows the following connections:

- A connection eastwards to a signed cycle route to Crawley and off-site enhancements of that cycle route;
- A connection northwards to Crawley via Bridleway 1546 which will benefit from improved surfacing, drainage and lighting (particularly the well-used underpass beneath the A264) all of which can be delivered by Cottesmore Village;
- A connection north-eastwards via Footpath 1545 through Buchan Country Park and connecting with Horsham Road, Crawley.
- A connection south-eastwards via Footpath 1545 to Forest Road. It is proposed to provide a footway in the existing highway verge along the northern side of Forest Road/Horsham Road to connect the site to Pease Pottage and vice versa.

In addition to the site's location close to Crawley, there is good opportunity for future bus routes (e.g. extended and enhanced existing services and/or new services) to be incorporated into Cottesmore Village. The proposed scheme could enhance the public transport connections in a number of ways including:

- Increasing the frequency of an existing bus route and divert it to serve Pease Pottage and the site e.g. ;
 - Extend the existing 271/273 Crawley to Brighton buses from eastern Pease Pottage to the site and increase the frequency from 1 to 2 per hour to every 20-minutes; and/or
 - Divert the existing 23 Crawley to Worthing via Horsham buses from the A264 to serve Pease Pottage and the site and increase the frequency to every 20-minutes; and/or
 - Deliver a new hopper bus service between the site, Pease Pottage and central Crawley and/or Horsham (including the station(s)) operating with a circa 20-minute frequency.
- The provision of bus stops with seating, timetable information and shelter within the site so that new residents have a very short walk to access buses.
- The provision of real time information at the bus stops and on local buses.

New homes can be designed to facilitate home working, e.g. through ensuring that there is a well designed, dedicated and separate space within the home where it is possible to work productively in terms of having sufficient room, segregation from the rest of the household as well as having somewhere comfortable, well ventilated and well lit. In addition, fast broadband speeds will be important.

The concept of development in the area where Cottesmore Village is located is outside of Crawley Borough and primarily within Horsham District and so A2Dominion acknowledge that it is not the role of the Crawley Borough Local Plan Review to allocate development in this area. However, as these representations consider, it is appropriate for the Local Plan Review to include text regarding the scale of unmet housing need, its economic significance and the way in which these matters could be addressed.

Furthermore, we expect that Crawley Borough Council will be familiar with the concept of development in the area where Cottesmore Village is located as this was considered in a document published in September 2005 and titled 'Feasibility Study for Development Options at Crawley'.

REPRESENTATIONS

The following section of this letter sets out specific representations on behalf of A2Dominion in response to the content of the Regulation 19 Local Plan consultation document.

Housing Provision

Policy H1 (Housing Provision) of the draft Local Plan states that:

“The Local Plan makes provision for the development of a minimum of 5,030 net dwellings in the borough in the period 2024 to 2040

This minimum requirement will be broken down into an annual average requirement on a stepped basis as follows:

- *Years 1-5 (2024-29): 400 dwellings per annum (dpa)*
- *Years 6-10 (2029-34): 360dpa*
- *Years 11-16 (2034-40): 205dpa*

After this supply is deducted from the identified housing need of 12,080 over the period 2024 to 2040, there will be a remaining unmet housing need, of approximately 7,050 dwellings, arising from Crawley over the Plan period. This will arise as follows:

- *Years 1-5 (2024-29): 355dpa*
- *Years 6-10 (2029-34): 395dpa*
- *Years 11-16 (2034-40): 550dpa*

The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.” (our emphasis).

The Housing Need Topic Paper (May 2023) (Topic Paper 3) published by CBC explains that the Standard Method results in a Local Housing Need figure of 755 dwellings per annum. We agree with that figure at the time of writing.

The level of development planned through Policy H1 is, as paragraph 12.36 of the draft Local Plan explains, ‘supply-led’, reflecting the limited land availability of the Borough, amongst other reasons. We welcome the fact that paragraph 12.38 of the draft Local Plan explains how “every opportunity for residential development within the borough has been fully considered”. The draft Local Plan sets out (paragraph 12.39) that “approximately 42% of the borough’s predicted housing need over the 16 years 2024 – 2040 can be met within the borough boundaries.” That means that the greater part of the housing required in the Borough cannot be met within its administrative boundaries.

It is also clear that Crawley is an economic hub in this region and that the presence of Gatwick Airport only serves to reinforce the town’s role, highlighted by its location at the heart of the Gatwick Diamond. As such, A2Dominion firstly commend the Council for seeking to address its housing need as far as possible, but also note the importance of this need being addressed in a sustainable manner if the town’s economic role is to be supported.

The need to ensure that Crawley's housing need is met has broader socio-economic ramifications.

Topic Paper 3: Housing Needs which has been published in support of the Local Plan explains¹ that "lower quartile house prices in Crawley are 10.7 times earnings and that whilst this might be below the Housing Market Area and West Sussex average, it is substantially higher than the national (England) average". Topic Paper 3 also records that² "The Updated SHMA found that the affordable housing need in Crawley equated to a total of 739 affordable homes per year, of which 563 (76%) dwellings were needed as rented affordable homes, and 176 (24%) dwellings were needed to be provided for affordable home ownership." In these circumstances, where the Local Plan recognises that provision will be made for a minimum of 5,030 net dwellings in the borough in the period 2024 to 2040 (representing an average of around 314 dwellings per annum over 16 years), and an affordable housing requirement (through Policy H5), it is absolutely clear that there will be a very significant unmet need for affordable housing. The annual average requirement for all forms of housing is less than half the requirement for affordable housing.

In support of these concerns, we refer to the conclusions of the Sustainability Appraisal / Strategic Environmental Assessment (May 2023) published in support of the draft Local Plan. Appendix G of that document includes an assessment of the Local Plan policies and options. Those include different options for the scale of housing planned in the Borough. Options 8 and 9 for Policy H1 relate to a supply led housing requirement and demonstrate clear socio-economic weaknesses when compared to those options which plan for greater levels of delivery.

A2Dominion consider that there are very strong socio-economic reasons why measures should be taken to ensure that the affordable housing needs arising from Crawley are properly addressed. However, we recognise that the tightly drawn administrative boundaries and constrained nature of the Borough present real obstacles to the delivery of housing in general, including affordable housing. Having established that the affordable housing needs should be addressed, A2Dominion consider that this should be done as close as possible to where they arise to support economic, social and environmental sustainability. Topic Paper 3 recognises that the relationship between lower quartile house prices and earnings in Crawley is lower than HMA and West Sussex averages. With that in mind, there is a strong prospect that displacing housing delivery in general, but affordable housing in particular, away from Crawley may exacerbate those affordability issues. Furthermore, the draft Local Plan³ also recognises that Crawley's residents are less likely to access higher paid jobs. Displacing housing, particularly affordable housing, intended to meet the needs of Crawley away from the town is likely to exacerbate the obstacles to accessing employment opportunities, and increase the cost of travel to them. By consequence, displacing housing away from Crawley, the overall effect is to increase unsustainable commuting patterns.

Addressing Crawley's Unmet Housing Needs

We welcome the recognition at paragraphs 2.26 – 2.29 that the Crawley Local Plan is unable to make provision for all of the housing need within the Council's administrative boundaries. Furthermore, we welcome the recognition (at paragraph 2.27) that "Crawley's housing market functions within a wider geographic area – identified as the Northern West Sussex Housing Market Area, which is predominantly within the local authority administrative areas of Crawley Borough, Horsham and Mid Sussex Districts; extending northwards into the administrative area of Reigate and Banstead Borough to a lesser degree".

In our submission, the economic significance of Crawley, and the role that it plays in the HMA and in the wider area (for example the wider Gatwick Diamond area) means that all efforts should be made to accommodate the unmet needs arising from the town. The failure to do so puts the economic growth and success of Crawley and the wider area at risk.

We note that the Local Plan identifies that the unmet need to 2040 equates to 7,050 dwellings with this calculated by deducting the planned requirement (5,030 dwellings) from the identified housing need (12,080 dwellings). However, we understand that the planned requirement is a 'supply-led' calculation and as such, when calculating the degree of unmet need to be addressed by adjoining authorities, it may be necessary for them to provide a 'buffer' to ensure greater certainty that, in combination, the needs will be addressed.

¹ Paragraph 3.3.1

² Paragraph 3.3.3

³ Paragraph 9.70

Furthermore, we would encourage dialogue to ensure that it is not just the total numerical housing requirement which is achieved as there remains a significant need for affordable housing in the HMA.

We reserve the opportunity to submit further comments and evidence regarding the extent of the unmet need as the Plan progresses and further evidence emerges.

Paragraph 2.29 of the draft Local Plan includes a table identifying the existing Objectively Assessed Housing Needs, existing Local Plan requirements and the Standard method requirement for Crawley, Horsham and Mid Sussex Districts, as well as the North West Sussex HMA as a total. In each case (and cumulatively), the Standard Method results in an increased requirement relevant to the OAN or Local Plan requirements and demonstrates that the emerging Local Plans in Horsham and Mid Sussex are also likely to grapple with additional level of housing delivery, even before Crawley's needs are addressed.

Given the significance we attach to addressing Crawley's unmet housing needs, we explore whether this could be achieved within the emerging planning context of adjoining authorities (Mole Valley; Reigate & Banstead; Tandridge; Mid Sussex; and Horsham):

- The SoCG with Mole Valley District (January 2021) records that the two authorities are within different HMAs (Mole Valley being in the Kingston and North East Surrey Housing Market Area) and that "Due to the need to undertake site-specific exceptional circumstances testing to determine whether it is appropriate for individual sites to be released from the Green Belt, it is not currently considered possible to meet any of Crawley's housing needs within Mole Valley."
- The SoCG with Reigate & Banstead Borough (January 2021) records that the "There is some relationship between the North West Sussex Housing Market Area and the Horley area. However, RBBC as a whole falls within the East Surrey Housing Market Area." In addition, the SoCG records that "RBBC is not in a position to meet any of CBC's unmet housing need"
- The delays associated with the Tandridge Local Plan are well known, with the Inspector having advised that significant work is required in relation to highways matters for example. In any event, it is relevant to note that the examination version of the Tandridge Local Plan does not make provision for the unmet needs of Crawley Borough Council. We note that there is no SoCG between TDC and CBC.
- Mid Sussex District Council published the draft District Plan 2021-2039 for public consultation between the 7th November and the 19th December 2022. In the draft District Local Plan, Policy DPH1 sets the Local Housing Need figure of 20,142 dwellings between 2021 – 2039. The same policy sets out the total expected supply from all sources of 20,444 dwellings over that same period, representing an 'oversupply' of 302 dwellings. In our submission, those 302 dwellings should be taken as a buffer to the MSDC requirement. In our conclusion, the MSDC draft District Plan makes no numerical provision for the unmet needs of Crawley.
- Horsham District Council consulted on the Regulation 18 Draft Local Plan between 17 February and 30 March 2020, however the Plan's progress has since been subject to a number of delays. In the 2020 consultation, HDC set out that the standard methodology calculation for Horsham District is calculated as 965 dwellings per annum, equating to a minimum of 17,370 homes in the period between 2019 and 2036. The exact level of supply being planned for is unclear given the scope of the consultation, however we note that there were three options considered for the housing requirement⁴:
 - 1,000 homes per annum, intended to address the minimum local housing need as determined using the Government's standard formula;

⁴ HDC Regulation 18 draft Local Plan 2020, paragraph 6.14

- 1,200 homes per annum, with this intended to “meet the local housing need and 5% buffer. It would also provide around 200 homes each year to help meet the unmet housing needs of Crawley in particular, and a small element in the Coastal Sussex area.”⁵
- 1,400 homes per annum, with this intended to “meet the local housing need and 5% buffer and provide around 400 homes each year to help meet the unmet housing needs of Crawley and the Coastal Sussex area.”

There are five authorities surrounding Crawley (Mole Valley, Reigate & Banstead, Tandridge, Mid Sussex and Horsham). Two of those have agreed common ground with Crawley BC that they are unable to accommodate the town’s unmet need, whilst the third makes no such provision in its emerging Local Plan. In addition, the capacity of the land to the north of Crawley is also reduced by the presence of Gatwick Airport (as demonstrated by the Safeguarded Land shown in Figure 1 of Topic Paper 2 in relation to Gatwick Airport).

The remaining two (Horsham and Mid Sussex) are at differing stages in the plan-making process. In our submission, this wider context reinforces the fact that the Crawley Local Plan should not include any text which might be taken as suggesting that the growth of Crawley should only occur in certain directions.

In our submission, the only realistic opportunities to address Crawley’s unmet housing needs are within Mid Sussex and Horsham Districts. The emerging Local Plan for MSDC makes no such provision, whereas the situation in Horsham is unclear.

We note that paragraph 3.1.11 of CBC’s ‘Topic Paper 1: Unmet Needs and Duty to Cooperate’ (May 2023) states that “*The draft Mid Sussex District Plan Review (Regulation 18) was published for public consultation between November and December 2022. This proposed a strategic allocation on Crawley’s eastern boundary at Crabbet Park for approximately 2,300 new dwellings (1,500 within the Plan period) as part of a new sustainable community.*”

Our understanding is that the development being considered at Crabbet Park by MSDC is accounted within the overall supply for their draft Local Plan, and therefore would play no role in meeting the numerical requirements of Crawley Borough Council.

Whilst we support CBC’s references to working with other authorities to address unmet housing needs, our review demonstrates that significant progress will be required in order that this is achieved.

Development adjacent to Crawley

Paragraphs 2.30 – 2.33 of the draft Local Plan relate to the growth of Crawley outside of its administrative boundaries and, in turn:

- Paragraph 2.31 refers to planned development in other authorities
- Paragraph 2.32 states that “*Other potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary. All opportunities are being explored to understand whether these would constitute the most sustainable housing development locations in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.*”
- Paragraph 2.33 states that “*This plan should not be considered as an indicator of the extent of acceptable development adjacent to Crawley.*”

In our opinion, the Crawley Local Plan should not seek to identify the potential locations for growth outside of Crawley. However, that is what appears to be inferred by paragraph 2.32. It is quite right that the Local Plan does

⁵ The Coastal Sussex HMA includes Brighton & Hove, Shoreham and Worthing but extends northwards into the southern part of Mid Sussex District, and covers the settlements of Steyning, Upper Beeding and Henfield in the south east of Horsham District

identify a significant unmet housing need, but it is for the adjoining authorities to accommodate this. Further analysis may well indicate that such opportunities exist to the south of Crawley. Our proposed approach is reinforced by the text at paragraph 12.21 of the Local Plan which refers to the complexities associated with the westward expansion of Crawley and the Western Link Road.

We consider that paragraph 2.32 should be amended as follows in order to ensure consistency with paragraph 2.33:

~~“Other potential urban extensions to Crawley may include extensions to the east and/or west of the borough boundary. All opportunities are being explored to understand whether these would constitute the most sustainable housing development locations around Crawley can accommodate its growth in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.”~~

Urban Extensions: ‘At Crawley’

Paragraph 12.18

We welcome the recognition that sustainable new neighbourhoods could play an important role in meeting Crawley’s housing needs. We also welcome the recognition that other potential urban extensions to Crawley outside its administrative area could be explored in the future in order to meet the arising housing need of the borough. As with our earlier comments, the Local Plan should not be used as a tool to support/discourage specific locations for that growth as all such opportunities should be considered.

Paragraph 12.23

We welcome the fact that Crawley Borough Council has provided guidance as to the circumstances where it will support housing development through urban extensions on or close to its administrative borough boundaries.

The following table sets out A2Dominion’s explanation as to how the proposal at Cottesmore Village could achieve those expectations:

Criterion	Reponse
i. Cumulative infrastructure needs are clearly identified and programmed for delivery in coordination with new development, and the proposal would not result in severe cumulative impacts of the development for existing residents in Crawley, including in terms of traffic and transport, flooding and drainage, air quality, town centre and community and social facilities.	In the event that Cottesmore Village is taken forward, A2Dominion would work with stakeholders, including relevant Local Planning Authorities to consider the impact of the proposals, their impact and the need for infrastructure.
ii. If development is proposed to the western side of Crawley, the scoping, design and delivery of the comprehensive Western Link Road (connecting from the A264 to the A23, north of County Oak, Policy ST4) should be agreed and provided prior to the completion of properties unless otherwise agreed by the three local authorities: Horsham District, Crawley Borough and West Sussex County Councils.	This is not relevant as Cottesmore Village is to the south of Crawley
iii. Crawley’s character as a compact town within a countryside setting, developed on a neighbourhood principle which maximises the use of sustainable transport is maintained.	Cottesmore Village has been informed by a detailed analysis of the landscape character and further design and masterplanning work can presented to demonstrate this. It is anticipated that the scheme would utilise and enhance public transport services

	and sustainable transport modes.
iv. The design of the urban form and infrastructure is of high quality design which is not unnecessarily prominent in the existing landscape setting.	Cottesmore Village has been informed by a detailed analysis of the landscape character and further design and masterplanning work can be presented to demonstrate this. A2Dominion would work with stakeholders to develop a scheme of high quality urban design.
v. Developments are designed and progressed as comprehensive neighbourhoods rather than incremental ad hoc development.	Cottesmore Village offers the opportunity to design a new neighbourhood in a comprehensive manner.
vi. Neighbourhood centres containing local facilities and services are provided in order to meet the day-to-day needs of residents.	Cottesmore Village is envisaged as a new community including a local centre to meet day-to-day needs.
vii. The development helps address unmet development needs arising from Crawley, including in relation to housing mix, type, tenure and affordability (including meeting the 40% affordable housing levels and agreements in relation to the nomination rights for those on the Crawley housing register); complementary employment and economic growth needs; social, education and health needs; and strategic recreation and leisure requirements.	Cottesmore Village is strategically located so as to help meet the market and affordable housing needs of Crawley Borough. A2Dominion would be willing to engage with local stakeholders, including local planning authorities, in relation to the affordable housing obligations.
viii. Linkages are maintained from Crawley's neighbourhoods through new development to the countryside beyond (both in terms of active transport and visual links) as well as prioritising sustainable modes of transport links (public transport, cycling and walking routes) into existing Crawley neighbourhoods and the town centre, making car journeys a longer, more circuitous option.	Cottesmore Village is located close to the existing communities within Crawley and connections between these neighbourhoods can be achieved, including via public transport.
ix. A landscape character, setting and heritage appraisal has been undertaken which: a. identifies the scale, extent and spatial characteristics of the existing landscape structure and grain, including natural and man-made features, field patterns, views, landscape structure, tranquillity and sense of space or enclosure, and provides an understanding of how they are experienced, used and perceived; and this b. has led to an assessment of the impact of the development on the landscape character, setting and heritage of the area, and the setting of Crawley's neighbourhoods and development is planned to ensure the key landscape features, character areas, areas of tranquillity and settings are protected, and the way they can be experienced	Cottesmore Village has been informed by a detailed analysis of the landscape character and further design and masterplanning work can be presented to illustrate how development can be accommodated in a high quality landscaped setting. A2Dominion would work with stakeholders to develop a scheme of high quality urban design which is informed by the detailed understanding of landscape and heritage considerations for example.

is enhanced.

<p>x. Development has been designed and planned to carefully address both its connections to existing Crawley neighbourhoods as well as the wider countryside beyond, providing defensible boundaries which both prevents inappropriate merging of settlements or the effects of urban sprawl and ensures the careful stitching together of existing and new built form where appropriate.</p>	<p>Cottesmore Village will not lead to the merging (actual or perceived) of settlements. It is located close to the existing communities within Crawley and connections with be achieved to these neighbourhoods. The landscape structure around the site offers the potential to accommodate the new community within defensible boundaries.</p>
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<p>xi. Ancient woodland or veteran trees would not be damaged or lost and an appropriate buffer, in accordance with national guidance, is provided between any such trees and the edge of the development's construction. Any TPO protected trees should be retained where possible and measures to avoid damage and root compaction should be implemented. Where the loss of existing trees is unavoidable, appropriate replacement trees are to be provided.</p>	<p>The initial proposals for Cottesmore Village have been prepared based on assessments of the site and area, including in relation to arboricultural matters. A2Dominion's further masterplanning will develop these elements of the proposal as part of a holistic scheme.</p>
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<p>xii. Development must incorporate strategic Green Infrastructure throughout, providing ecological linkages, in particular to support pollination, and result in a Net Gain to biodiversity.</p>	<p>The initial proposals for Cottesmore Village have been prepared based on assessments of the site and area, including in relation to ecology and landscape matters. A2Dominion's further masterplanning will develop these elements of the proposal in order to achieve biodiversity net gain.</p>
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<p>xiii. Development must be designed to exemplar sustainability standards, taking advantage of the potential of a masterplanned approach and economies of scale, and must design in tight energy and water efficiency targets from the outset in order to futureproof developments for a zero carbon future and a changing climate.</p>	<p>If Cottesmore Village is to be taken forward then A2Dominion would commit to working with relevant stakeholders through the masterplanning and detailed design stages so that these considerations are taken into account throughout the process.</p>
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<p>xiv. Development proposals use bespoke Area Wide Design Assessment tools from the outset which will aim to set out and enable development proposals to identify, understand and fit in with the overall form and layout of their surroundings.</p>	<p>If Cottesmore Village is to be taken forward then A2Dominion would commit to working with relevant stakeholders through the masterplanning and detailed design stages so that the scheme is informed by a detailed analysis and understanding of the wider area and its character.</p>
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SUMMARY

A2Dominion consider that addressing the housing and economic needs of Crawley Borough is critical. These needs cannot be addressed within Crawley itself and for various reasons, the opportunities to address them elsewhere are limited, especially to the north of the town. Addressing these needs is critical to the availability of new housing, and new affordable housing in particular, and opportunities to so, close to where the need arises should be taken. Not meeting these needs, or providing for them away from Crawley is likely to harm the access to affordable housing to employment opportunities and provide a missed opportunity to support and enhance Crawley's local economic role.

A2Dominion therefore support the early recognition by CBC of the imperative that its unmet needs are addressed. Proactive and coordinated dialogue will be required with a number of stakeholders in order to ensure that this objective is achieved.

Yours sincerely

David Murray-Cox
Director

david.murray-cox@turley.co.uk