

Ref: P193269
Date: 20 June 2023



Vail Williams LLP
Unit 4 Peveril Court
6-8 London Road
Crawley
West Sussex
RH10 8JE

Tel 01293 612600
vailwilliams.com

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

Emailed to: strategic.planning@crawlley.gov.uk

Dear Sallie & Elizabeth,

Response on behalf of Chichester College Group to Crawley Borough Council Local Plan Review 2024 - 2040 Regulation 19 Local Representations

Further to our previous representations to Regulation 18 and 19 of the Crawley Borough Local Plan Review, we are writing on behalf of our clients Chichester College Group regarding their site at College Road, Crawley.

In line with our previous Regulation 18 & Regulation 19 representations, we still wish all previous comments to be considered by CBC and the Inspector, and these additional comments should be read in association with all our previous submissions.

As you are aware, ongoing work continues under One Public Estate between the College, the Crawley Borough Council and West Sussex County Council as adjacent landowner, in regard to how the three sites at the Town Hall, County Buildings and the College form the Eastern Gateway.

Our main areas of comment relate to the Regulation 19 Local Plan Review Document and its supporting evidence base, primarily the Heritage Report by Place Services the May 2023 Sustainability Appraisal.

Town Centre Opportunity Sites: Policy TC3

We note that our clients site remains as an allocated under Policy TC3 as a Town Centre Key Opportunity Sites and we welcome the inclusion, which reflects our ambition to retain education uses on the south of the site and redevelopment opportunities on the north of the site. We also support the wording that reiterates this mixed use for the site as *“Crawley College (mixed use development with priority for education)”*.

Following our Masterplan work with your officers and members, we confirm that we agree that the Masterplan adopted 2019 ensures that in line with Policy Tc3 that *“the development positively contributes to the vitality and viability of Crawley Town Centre and sustainable economic growth and job creation in the borough.”*

We also note that if there is a scenario where no residential development is proposed, that *“the development will not undermine the delivery of a minimum of 1,500 net dwellings cumulatively across the sites”*.

LISTEN

CARE



INNOVATE

LEAD

Following the STEM application and its s106 we are aware that *“any development must accord with an appropriate master plan agreed with the Local Planning Authority and covering the whole campus and will be required to demonstrate that it can be achieved in a manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility.”*

We also support the policy reconfirming that *“The council, working with WSCC and Crawley College through One Public Estate, has aspirations to create a commercial eastern gateway with significant new office presence on the Town Hall and County Buildings sites.”*

In regard to Policy H2 on Town Centre Housing sites: Key Housing Sites we note that our site as a Town Centre Key Opportunity Sites is expected cumulatively to provide 1,500 net dwellings alongside Telford Place, Crawley Station and Car Parks (deliverable), County Buildings (developable), Land North of the Boulevard (deliverable) and Crawley College (developable) as well as Cross Keys (developable) and MOKA (which is currently under construction).

We also note that in the appendices the Housing Trajectory - Base Date 31 March 2023 highlights a potential of 363 units in line with Crawley College Adopted Masterplan June 2018.

Regarding the Sustainability Appraisal, May 2023: Assessment of Town Centre Key Opportunity Sites (Policies H2 and TC3), we note the allocation on the College site scores positively particularly regarding Objective 3. *“Protect and/or Enhance the Built Environment: The site is located within the Town Centre and residential and/or mixed-use development would be in keeping with Local Plan objective of increasing residential development in the Town Centre and promoting its overall vitality and viability”, whilst “Good quality design could enhance the built environment”. We agree with the Positive Impact score (+) and the Conclusions which state that “The site is a brownfield site, offering good opportunities for high quality residential development/mixed use development including education, in a sustainable location.”*

Regarding Objective 4, we will continue to work with the council to consider the correct mix and tenure of units, at the time of any formal planning application, and note policy requirements for Decent/ Affordable Homes, and the policy requirement of 40% affordable subject to viability.

Policy HA5: Local Listed Buildings & Place Services Report Dec 2020 Evidence Base

As per our previous representations to the heritage assessments and consultation, we contest that the supporting evidence base document by Place Services Dec 2020 is sound and robust.

Page 176 of the report assesses the *“entrance to Tower Building”* and concludes that it should be *“considered for local listing inclusion”*. In addition, on page 178 the assessment also highlights *“a 4-storey building”* in the centre of the site as also *“considered for local listing inclusion”*.

Our clients have actively engaged with CBC and made objections to this listing and overall evidence base document previously, which does not appear to have been amended, despite additional information being submitted. The additional information provided to the council, was regarding the physical state of disrepair of these buildings, and the Masterplan indicates that both buildings are no longer fit for purpose and for comprehensive development, as supported by Policy TC3 and H2, these would need to be removed.

We therefore continue to object to the evidence base and the resultant policy HA5.

Given the state of the buildings, and the agreed and adopted Masterplan from June 2019, the Council have already endorsed the removal of these buildings, and this is therefore inconsistent with evidence base documents.

With regard to the wording of Policy HA5: Locally Listed Buildings confirms that *“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”*.

We have stated that we do not believe these 2 buildings have any significance in regard to *“Aesthetic/Architectural Value; Historic Value; Social/communal Value; Landmark/Townscape Value; and Archaeological Interest”*.

We contest that if Policy HA5 is found sound, despite the approved Master plan for the site, and our evidence submitted regarding the poor state of the buildings, that any subsequent planning application would only allow *“the demolition or partial demolition of a Locally Listed Building ...in exceptional circumstances if the development proposals a) reflect or retain the key features of the original building;”*. We therefore find the evidence base and policy H5 in its current form unsound.

We are grateful for the opportunity to comment as part of this Regulation 19 Local Plan but suggest that the evidence base underpinning Policy H5 is unjustified, not robust, and therefore H5 is unsound.

Please note we wish to participate in proceedings and look forward to hearing from CBC regarding formal submission to PINS.

Yours sincerely



Suzanne Holloway BA (Hons) BTP MRTPI
Partner
For and on behalf of Vail Williams LLP
Mob: 0779 693 8554
Email: sholloway@vailwilliams.com