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*Via email: [strategic.planning@Crawley.gov.uk](mailto:strategic.planning@ Crawley.gov.uk)*

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Dear Sir/Madam

**NETWORK RAIL RESPONSE TO CRAWLEY BOROUGH COUNCIL LOCAL PLAN  
(REGULATION 19) CONSULTATION**

Thank you for providing Network Rail the opportunity to make comment on the Regulation 19 version of the Local Plan. Network Rail have previously submitted comments around Gatwick Airport and the work that has been undertaken, the below are additional covering other issues and the latest evidence base documents.

Network Rail is the statutory undertaker for maintaining and operating railway infrastructure of England, Scotland, and Wales. As statutory undertaker, Network Rail is under license from the Department for Transport (DfT) and Transport Scotland (TS) and regulated by the Office of Rail and Road (ORR) to maintain and enhance the operational railway and its assets, ensuring the provision of a safe operational railway. As a matter of course, proponents of sites which are close to the railway boundary or sites which could affect the railway asset directly are required to engage with our Asset Protection and Optimisation team (ASPRO). Similarly, there are a range of level crossings (both vehicle and pedestrian) that will experience increased usage from the proposed developments proposed within the draft Local Plan. As part of Network Rail's license to operate and manage Britain's railway infrastructure, Network Rail have the legal duty to protect rail passengers, the public, the railway workforce, and to reduce risk at our level crossings so far as is reasonably practicable. A case-by-case risk assessment is required for the affected level crossings as and when planning applications are made and full details of the development has been provided. The assessments may identify that improvements / closure of level crossing is required to mitigate the imported risk. As a public funded company, Network Rail has responsibilities to spend public funds efficiently which

consequently means we do not have the funds available to mitigate the impact of third party development on level crossings. Consequently, Network Rail expect any mitigation required to be funded at no expense to Network Rail

### Local Plan

Network Rail have concerns over Crawley seeking to meet 42% of its total housing need and the potential impact of unmet need on neighbouring authorities. Crawley's location within the Gatwick Diamond and the improvements to Gatwick Airport Station, and possible further extensions to Gatwick Airport, places the Borough as a central tenement of both the local and national economy. The location of Crawley means that it should be contributing significantly to meeting housing need with the Diamond. The impacts of unmet need on neighbouring authorities places huge stresses on infrastructure provision and could make the deliverability of housing need (plus unmet need) especially challenging. These impacts on infrastructure, especially the rail network, requires the identification of funding opportunities from developer contributions. In undertaking the Local Plan Review, Network Rail does not believe that these impacts have been fully assessed or that a suitable spatial strategy, that doesn't rely on neighbouring authorities meeting unmet needs, has not been fully considered. Without meeting need, and capturing developer contributions from this to improve the infrastructure, Crawley places itself in a position whereby the spatial strategy is not sound and failing to fully secure improvements for the Borough.

There are continued concerns over the inclusion of the car park at Crawley Station as part of the Town Centre Key Opportunity Sites. There appears to be no proposals for the re-provision of the car park serving the rail station should the existing be lost. Whilst Network Rail encourages active and sustainable modes of transport to access the station, there remains a need for those who are unable to access other modes to be able to drive and park close to the station. The removal of this modal choice impacts negatively on the diversity of offer for those accessing the station and we would encourage the Council to address this issue. Any loss of the car park would conflict with draft policy IN1 which sets out that 'existing infrastructure services and facilities will be protected....unless there is sufficient alternative provision of the same type in the area, or an equivalent replacement'.

Further, Network Rail suggest that where development occurs close to Crawley station, within the identified Opportunity site, that consideration is made to securing improvements to the station to support the anticipated increased use of this as a result of potential development that would come forward. Reference to securing developer contributions to support these improvements, both at Crawley station and others in the Borough should be included in the Infrastructure Plan.

### Infrastructure Plan

It should be noted that the Croydon Area Remodelling Scheme (CARS) has been delayed and there is no updated timetable for completion at this stage. Reference to this within the rail section can be retained however it may be necessary to provide an update to this in the near future.

Consideration should be given to the impacts of the amount of development proposed within Crawley Town Centre on the level crossing located on Brighton Road. Due to the location and proximity of this crossing, it is anticipated that this will be subject to increased use by cars, pedestrians and cyclists. Due to this, alternative mitigations may need to be considered to reduce the risk at this crossing and reference to this should be

included within the Infrastructure Plan. It would be expected that any such mitigations would be funded by developer contributions due to the impacts of growth.

I trust that the above is clear, should you require additional information please do not hesitate to contact me.

Kind regards,

**Craig Hatton MRTPI**  
**Senior Town Planner**