

Crawley

Local Plan

Crawley Borough Local Plan Examination

Crawley Borough Council Response to Inspectors' Matters, Issues and Questions

Matter 10: Transport and Infrastructure

December 2023



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Issue 1: Whether the approach to transport infrastructure to support the plan's proposals is soundly based.

10.1 Question 10.1: Is it necessary for soundness that the submitted Plan content be amended to reflect the recent DfT Circular 01/22 in terms of ensuring transport demand on the strategic road network is minimised through positive visioning for development sites and interventions to support modal shift? Reference was made on submission to undertaking a checklist exercise in respect of Circular 01/22, is that likely to indicate any potential main modifications?

10.1.1 Crawley Borough Council (CBC) has now submitted the DfT Circular 01/2022 Consistency Checklist (Submission Document Reference: SoCG/15b). As detailed in that checklist, CBC considers that the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) is compliant with DfT Circular 01/22, and that many of the principles set out in the Circular (the need to reduce the need to travel, the need to prioritise active and sustainable forms of travel, and the need to locate and design developments with a view to realising these opportunities) are already embedded in the council's approach.

10.1.2 At the same time, CBC notes the representations made by National Highways and, as part of our ongoing engagement with them, the council would like to propose some modifications to Policy EC4: Strategic Employment Location, in order to formalise the requirement for a 'vision' at the master planning stage in respect of this strategic development, as follows:

In Policy EC4, requirement 'd)' is amended as follows:

d. Demonstrate through a comprehensive Mobility Strategy how the development will achieve the master plan vision-led approach as regards movement and accessibility, including through ~~include~~ measures and improvements ~~to~~ that maximise sustainable access to the site, ~~focusing on how the development will~~ and optimise the ~~usage~~ of sustainable modes of transport as opposed to the private vehicle. The Mobility Strategy will ~~and detailing~~ detail infrastructure improvements that will be required to adequately mitigate the development impacts on the highways network, ~~detailing and set out~~ how these improvements will be delivered and operated. 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.

In Policy EC4, requirement 'f)' is amended as follows (this is a change to a previously proposed modification):

f. Submit a Construction Management and Phasing Plan, ~~to include measures that consider and acceptably~~ mitigate any adverse impacts ~~construction impacts~~ on local and strategic road networks during the construction phase.

In Policy EC4, an addition is made to the final paragraph as follows:

The development of the site will be in accordance with an agreed master plan, incorporating a vision-led approach as required by Department for Transport Circular 1/2022, produced by the site promoter in consultation with the council to

ensure comprehensive development in line with the above requirements. The master plan will be submitted at the outline planning application stage to assist the consideration of subsequent planning application(s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses.

In paragraph 9.58 of the Reasoned Justification, an addition is made to the end of the paragraph as follows:

'A Masterplan will be required for the whole of the allocated land, to show how the areas to be built upon in the current, and potentially future, Plan periods, will be landscaped and will fit within the setting of the wider site. [This will include a vision-led approach to development, prepared in accordance with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of sustainable development.'](#)

- 10.1.3 These proposed modifications are set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).
- 10.2 [Question 10.2: Is the Infrastructure Plan sufficiently clear and effective on likely mitigation required to the strategic road network \(M23 and A23\) as a consequence of the proposals and policies in the Plan over the period to 2040?](#)
- 10.2.1 Subject to the incorporation of further updates now proposed by Crawley Borough Council (CBC), the Infrastructure Plan, July 2023 (Submission Document Reference: KD/IP/01) supported by the proposed updated Crawley Infrastructure Delivery Schedule, December 2023 (Post-Submission Document Reference: CBC/KD/IP/08) is sufficiently clear and effective on the likely mitigation required to the strategic road network (SRN) as a consequence of the proposals and policies in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01).
- 10.2.2 As set out in the Infrastructure Plan, page 51, the following mitigations to the M23 are identified as being required as part of the Local Plan Strategy:
- Amendment to the lane markings in the reference case scheme at M23 Junction 10 associated with the Forge Wood development;
 - M23 Junction 10 southbound merge: change to layout replacing a single lane nearside merge with a parallel merge followed by an auxiliary lane, which in turn is followed by a taper to end the auxiliary lane;
 - M23 Junction 11 northbound diverge & northbound merge: lane drop on the northbound diverge and a lane gain on the northbound merge by reducing the mainline from three to two lanes northbound under the junction.
- 10.2.3 The basis of the identification of these improvements and their estimated costs are set out in the Crawley Transport Modelling Study, June 2022 (Submission Document Reference: ES/ST/01a) paragraphs 8.4.14 and 8.4.15 on pages 97-98; paragraphs 8.6.28 and 8.6.29 on pages 104-105; and paragraphs 8.8.2 to 8.8.15 on pages 106-109. Drawings of the proposed schemes are provided in accompanying Drawings 2, 3, and 8.1 (Submission Document Reference: ES/ST/01v).

10.2.4 Following the submission of the Crawley Borough Submission Local Plan, CBC has submitted the Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08). This is proposed as 'Appendix 2' to the Infrastructure Plan, and seeks to respond to concerns raised by National Highways in their representation to the 2023 Regulation 19 consultation (Rep 011 (2023)), and to the following 'next steps' identified in the Crawley Borough Council and National Highways Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/15a), p.6:

- *The Housing and Employment Trajectories will be aligned with the IDP to indicate the delivery of developments against known infrastructure improvements.*
- *Further detail concerning the costs and delivery mechanisms of highway mitigation measures, including the sustainable and active travel measures, will be provided in an updated Infrastructure Plan as soon as possible, and will be updated, monitored, and refined over time thereafter.*

10.2.5 Following the submission of the Infrastructure Delivery Schedule this document has been subject to further consideration as part of ongoing joint working between CBC and National Highways and, on this basis, CBC have prepared an updated version of the document to be submitted alongside this Written Statement (Post-Submission Document Reference: CBC/KD/IP/08). This has been shared with National Highway and seeks to address outstanding concerns regarding the clarity of the Local Plan strategy in terms of the timing and relative sequencing of development and infrastructure projects.

10.2.6 As a further measure to ensure delivery of necessary transport infrastructure mitigations alongside proposed development trajectories, CBC and West Sussex County Council (WSSCC) propose to establish a Transport Infrastructure Monitoring Group, involving CBC, West Sussex, and National Highways (as required) to monitor the delivery of the critical transport infrastructure projects identified in the Infrastructure Delivery Schedule. This proposal is consistent with the 'monitor and manage' approach to the provision of transport infrastructure, which informs the Crawley Transport Modelling Study (e.g., as set out in paragraphs 6.1.1 to 6.1.8 on pages 62-63).

10.2.7 In support of the proposed 'monitor and manage' CBC wishes to propose a number of modifications to Policy IN1: 'Infrastructure Provision' and its Reasoned Justification, to Policy IN2: 'The Location and Provision of New Infrastructure', to Policy ST1: 'Development and Requirements for Sustainable Transport', to the Crawley Submission Sustainability Appraisal (Submission Document KD/SA/01) and Crawley Local Plan Monitoring and Implementation Framework (KD/MIF/01), which are intended to link the implementation of the Local Plan strategy more explicitly to the Infrastructure Charging Schedule and its updates. These have been agreed with West Sussex County Council and are as follows:

i. In the main text of Policy IN1 a new paragraph is added as follows:

Strategic Policy IN1: Infrastructure Provision

Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of necessary infrastructure both on and off site (including where this infrastructure is located outside of Crawley but serves development

within Crawley). For individual proposed developments this includes the provision of mitigation to avoid any substantial cumulative effects on the existing infrastructure services.

Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless there is sufficient alternative provision of the same type in the area, or an equivalent replacement or improvement to services is provided at a location appropriate for serving the affected population.

The council will charge Community Infrastructure Levy (CIL) on development taking place within the borough in accordance with the council's adopted CIL charging schedule.

Where appropriate, developer contributions will be sought in the form of planning obligations to address site specific issues, in accordance with the tests in the CIL Regulations. The Planning Obligations Annex collates and sets out the anticipated planning obligations associated with the Policies established by this Local Plan.

[Reference should be made to the council's Infrastructure Delivery Schedule \(IDS\) and its updates which identify the Infrastructure projects supporting the Local Plan, and arrangements for their phasing, funding, and delivery. Developments which are required to submit a Transport Assessment in accordance with Policy ST1 should make reference to the IDS and its updates, and to Authority Monitoring Report updates on the implementation of these, in demonstrating the acceptability of their proposals. The need for improved transport infrastructure should be based on up to date information about travel demand as part of the 'monitor and manage' process.](#)

- ii. Paragraph 8.8 of the Reasoned Justification of IN1 is amended as follows:

8.8 It is important that the necessary infrastructure and community services are made available for the whole community, for everyone to enjoy a high quality of life. The NPPF highlights the role that the planning system can play in identifying and coordinating the provision of infrastructure⁷⁴ and requires strategic policies to make sufficient provision for infrastructure⁷⁵. The Infrastructure Plan (including the Infrastructure Delivery Schedule) sets out in more detail an assessment of infrastructure provision in Crawley, and the additional infrastructure required in order to support the Local Plan strategy. ~~These f~~ Facilities which make a contribution to the provision of infrastructure provision in the town will be protected unless alternative provisions are made. Where alternative provision is made this should be suitably located in terms of the functional requirements of the facility and the access requirements of the communities served, whether this be within or outside the boundary.

- iii. Paragraph 8.9 of the Reasoned Justification of IN1 is amended as follows to form 2 separate paragraphs, 8.9 and 8.10, (with green text representing modifications already proposed in the Schedule of Suggested Modifications), with subsequent paragraphs within Chapter 8 being renumbered accordingly:

8.9 It is a fact that development will place additional demands on infrastructure provision and that developers will be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring cumulative

effects are effectively mitigated. Development will be permitted where overall capacity limits, advised by infrastructure providers, are not breached. *The council will work proactively with infrastructure providers and developers to support the delivery of the improvements and facilities required to deliver the Local Plan strategy, and opportunities to secure additional funding will be ~~maximised~~ explored through proactive engagement with government agencies, other public sector organisations, and private investors. The council will convene a (nominally titled) Transport Infrastructure Management Group to keep the effectiveness, deliverability, and phasing of the transport infrastructure projects required to deliver the Local Plan strategy under review, as part of a 'monitor and manage' process. The Group will include West Sussex County Council and National Highways (as appropriate), and its findings will inform future updates to the Infrastructure Plan: Appendix 2 (Infrastructure Delivery Schedule), and the council's Authority Monitoring Report.*

8.10 The council will charge developers the Community Infrastructure Levy (CIL) on appropriate development, in accordance with the council's adopted CIL Charging Schedule and the CIL Regulations (2010) as amended, *and CIL funds will be used to contribute towards meeting needs identified in the Infrastructure Plan. Developers will also be required to address relevant site-specific issues and direct impacts on infrastructure and, subject to the relevant tests set out in CIL Regulation 122, these will be addressed through Section 106 agreements requiring on-site delivery and/or a financial contribution towards off-site provision. ~~The council will work proactively with infrastructure providers and developers to support the delivery of the improvements and facilities required to deliver the Local Plan strategy, and opportunities to secure additional funding will be maximised through proactive engagement with government agencies, other public sector organisations, and private investors.~~ The Planning Obligations Annex sets out the charges and calculations anticipated from the planning policies in this Local Plan and these have been subject to viability testing as part of the whole Plan and CIL Viability assessment, to support the Local Plan. The council's adopted Supplementary Planning Documents provide additional guidance on the use of S106 agreements.*

- iv. In the main text of Policy IN2 a new sentence is added as follows (with green text representing modifications already proposed in the Schedule of Suggested Modifications):

Policy IN2: The Location and Provision of New Infrastructure

The council will support the provision of new or improved Infrastructure in appropriate locations where the facilities are required to support development, where they improve the medium- or longer-term resilience of infrastructure in Crawley, or where they add to the range and quality of facilities in the town. The council's Infrastructure Delivery Schedule (IDS) and its updates identify a range of infrastructure projects aligned with these objectives.

The provision of community facilities alongside housing within sites allocated for uses including housing will be considered acceptable where:

- there is an evident need for the type of facility concerned;

- the infrastructure/facilities are suitable to meet the needs of the community served and the needs of future residents;
- the proposal complies with other policies in this Plan, including any site-specific requirements for additional or replacement services, facilities, enhancements, safeguards, investigations and other mitigatory measures.

Subject to the requirements above, education facilities may be considered acceptable as an alternative use on sites allocated for uses including housing where there is a demonstrated educational need arising in Crawley which cannot be met on another site.

Major facilities providing services on sites which are accessed by the whole town or wider area should be located in the most sustainable locations accessible **by public transport and/or active travel routes** ~~a variety of means of transport~~.

Local community facilities should be located close to neighbourhood centres, in the Town Centre, or at suitable locations near Three Bridges Station.

- v. Within the main text of Policy ST1 the reference to Transport Assessment requirements under b) is amended as follows:

Policy ST1: Development and Requirements for Sustainable Transport

b) Transport Assessment, which assesses the impact of a development when there are significant transport implications ([including consideration of the requirements of Policy IN1: Infrastructure Provision](#)), and:

- for large developments (for example, large-scale major residential developments or any strategic developments), a Mobility Strategy; or,
- for other developments, a Travel Plan.

The Mobility Strategy or Travel Plan will identify:

- how the development will optimise the usage of sustainable modes of transport as opposed to the private motor vehicle;
- appropriate improvements to sustainable modes, or the introduction of new infrastructure that is required to adequately mitigate development impacts and detail how this will be delivered and operated.

- vi. Within the Sustainability Appraisal on p.34 the monitoring indicator related to provision of identified priority infrastructure schemes (in the Table alongside Sustainability Indicator 8) to be reworded as follows:

~~Provision of identified priority infrastructure schemes (monitored through the Community Infrastructure Levy and Infrastructure Plan)~~

[Progress in delivery of critical infrastructure projects identified in Infrastructure Plan: Appendix 2 \(Infrastructure Delivery Schedule\), December 2023 – or future updates – alongside housing and employment development, in accordance with the Phasing Chart in the Schedule](#)

- vii. In the Monitoring and Implementation Framework on p.3 the same proposed indicator to be included under a new ‘Wellbeing and Communities’ heading at the beginning of the Table as follows:

Wellbeing and Communities
<u>Progress in delivery of critical infrastructure projects identified in Infrastructure Plan: Appendix 2 (Infrastructure Delivery Schedule), December 2023 – or future updates – alongside housing and employment development, in accordance with the Phasing Chart in the Schedule</u>
Economic Growth and Social Mobility
Gross delivery of office and industrial/storage & distribution floorspace as compared with projected take-up.
Losses of office floorspace to industrial/storage & distribution use and vice versa.
Losses of office and industrial/storage & distribution floorspace to non-employment uses as compared with projected losses.
Completed loss of employment floorspace to residential use via planning permissions in main employment areas.
Consented losses of office floorspace to residential use, broken down between planning permissions and prior approvals.
Net delivery of office and industrial/storage & distribution floorspace after accounting for losses, as compared with projected delivery.
Remaining Identified Employment Land supply.
Progress in development of Key Town Centre Opportunity Sites.
The number of gross and net dwellings (or dwelling equivalent in the form of C2 development) delivered as compared with the Local Plan target.

- viii. Also, in the Monitoring and Implementation Framework, on page 8, the section of the table listing indicators under the ‘Infrastructure Provision’ heading to be amended as follows (with the amended indicator to be confirmed as a key indicator by inserting a Y in the righthand column of the Table):

Rate of residential and commercial development to be in accordance with Local Plan annualised requirements and local commercial requirements.
<u>Progress in delivery of critical infrastructure projects identified in Infrastructure Plan: Appendix 2 (Infrastructure Delivery Schedule), December 2023 – or future updates – alongside housing and employment development, in accordance with the Phasing Chart in the Schedule</u> Provision of identified priority infrastructure schemes (monitored through the Community Infrastructure Levy and Infrastructure Plan).

- 10.2.8 These proposed modifications are set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).

- 10.3 Question 10.3: Does the fact the Crawley Transport Modelling Study is to 2035, whereas the plan period is 2040, indicate a level of uncertainty about impacts on transport infrastructure in the latter part of the plan period? Does the additional sensitivity testing to 2040 demonstrate that highway impacts attributable to the plan's policies and proposals have been appropriately considered over the totality of the plan period and a robust baseline (worst case scenario) established from which to develop mitigation approaches?
- 10.3.1 Crawley Borough Council (CBC) considers that the difference between the 2035 date for the Crawley Transport Modelling Study June 2022 (Submission Document Reference: ES/ST/01a) modelling work, and the 2040 date for the end of the Local Plan period does not carry any significant additional risk of exceedance of the scenarios modelled in the Study.
- 10.3.2 Prior to the conclusion of the Transport Study, the Plan period was extended to 2037 and the Study concluded, as summarised in paragraph 11.2.2 that *"The modelled Local Plan development quanta is consistent with that planned to 2037, while the difference in NTEM growth for West Sussex has been shown to be small for the modelled period to 2035 compared to the end of Local Plan period to 2037. It is considered that the modelling is robust and representative of demands and network impacts covering the Local Plan period to 2037."* This is explained in more detail in paragraphs 1.1.4-1.1.6 of the Study.
- 10.3.3 Further to this, after the publication of the Study and in response to queries from National Highways, CBC commissioned Crawley Transport Modelling Study TN01: Comparison of Trip Ends in NTEM (Submission Document Reference: ES/ST/01w), in order to assess potential implications arising from the variance between the 2035 date used in the Transport Modelling Study and the 2040 Local Plan end date. This compared the trips generated in the 2037 Reference Case to alternative '2040 Core' and '2040 High Growth' scenarios. The 2037 and 2040 scenarios were found to be comparable and, accordingly, the Technical Note concluded that in paragraph 5.3 on page 4 that 'the transport evidence base used to inform impacts of the Local Plan can be deemed to be robust.'
- 10.3.4 These findings are reflected in the Crawley Borough Council and National Highways Statement of Common Ground, July 2023, page 6 (Submission Document Reference: SoCG/15a) which notes:
'NH have reviewed the sensitivity testing and are content that the 2035 flows in the Transport Study present a worse case.'
'NH recognise that it is challenging to be certain about what will happen in years 11-15 of a Local Plan period. NH understand that during the first review of the Local Plan, there will be greater confidence about planned development for this period (2035-2040).'
- 10.3.5 Subsequently, CBC have provided confirmation to National Highways in the course of ongoing discussions that the total amount of housing delivery projected over the period up to 2040 as part of the submission Local Plan strategy remains within the limits that were modelled by the Study scenarios. CBC understands that this addresses the second of the Agreed Next Steps in Section 8 of the SoCG with National Highways.

10.4 Question 10.4: In terms of mitigating impacts attributable to the Crawley Borough Local Plan’s policies and proposals, are these identified and would they largely be implemented through developer funding?

10.4.1 The Local Plan Strategy in respect of transport mitigation, as set out in the Crawley Transport Modelling Study, June 2022 (Submission Document Reference: ES/ST/01a) and informed by the Crawley Transport Strategy ‘New Directions’, Crawley Transport Modelling Study, Appendix A, June 2022 (Submission Document Reference: ES/ST/01b) seeks to reduce the need for highways mitigations through the delivery of sustainable mitigations in the short and medium term. The Crawley Transport Modelling Study nonetheless identifies a residual requirement for a small number of mitigation schemes on the county highways and Strategic Road Network, in addition to a number of schemes which are already ‘committed’ (the latter of which include the list of schemes associated with the ongoing Forge Wood neighbourhood).

10.4.2 As set out in the Infrastructure Plan July 2023, page 51 (Submission Document Reference: KD/IP/01) and in the Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/07) the residual highways mitigation schemes are identified and costed as follows:

Location	Scheme	Cost (incl. 40% allowance for optimism bias)
A23 Crawley Avenue/ Ifield Avenue roundabout	Local widening scheme	£ 488,308.00
M23 Junction 10 Southbound Merge	Change to merge layout	£ 1,430,201.00
M23 Junction 11 Northbound Diverge and Merge	Lane drop on the northbound diverge and a lane gain on the northbound merge by reducing the mainline from three to two lanes northbound under the junction.	£ 3,646,620.00
M23 Junction 10	Amendment to the lane markings in the scheme to be delivered as mitigation of the Forge Wood development	£0
Total		£5,565,129.00

10.4.3 The above schemes are identified in the Crawley Infrastructure Delivery Schedule as ‘critical’. This package is endorsed from a Strategic Road Network perspective by the Crawley Borough Council and National Highways Statement of Common Ground, July 2023, pages 4-5 (Submission Document Reference: SoCG/15a) and from a county highways perspective in the Crawley Borough Council and West Sussex Statement of Common Ground, August 2023, page 5 (Post Submission Document Reference: SoCG/16).

10.4.4 It is projected that these schemes will be funded primarily via the developer contribution regimes (i.e., S106 and Community Infrastructure Levy). As detailed in the Introduction to the Crawley Infrastructure Delivery Schedule, it is projected that CIL funds available for expenditure on Infrastructure over the Local Plan period will amount to approximately £16.9 million, at 2023 values. It is anticipated that a proportion of the funding for these projects will be provided in the form of S106 financial obligations.

- 10.4.5 Additionally, the strategy requires the implementation of a package of sustainable transport schemes which will avoid the need for any additional highways' mitigation. The Transport Study, Section 6, pages 62-73, sets out the principles of this approach, while the Crawley Infrastructure Delivery Schedule identifies a number of specific sustainable transport schemes for delivery as mitigation for the development identified in the Local Plan. The proposed approach to sustainable mitigation is more fully detailed in answer to Question 10.5. However, it is projected that the sustainable mitigation package will be funded in aggregate by a combination of developer contributions, central government funds, Gatwick Airport Limited and West Sussex County Council Highways.
- 10.5 [Question 10.5: Are assumed reductions in vehicular trips in the transport modelling reasonable and realistic? What is the evidence for sustainable transport interventions being delivered in the plan period? What will be delivered in the Borough to facilitate modal shift as a consequence of the Local Cycle and Walking Infrastructure Plan and the Crawley Area Transport Strategy within the West Sussex Transport Plan 2022?](#)
- 10.5.1 Crawley Borough Council (CBC) considers that the proposed approach of reducing vehicular trips through sustainable transport interventions in order to reduce the need for highways mitigations is sound and consistent with national policy as out in National Planning Policy Framework 2021 (Submission Document Reference: PS/DS/NPPF/01) paras. 104-109.
- 10.5.2 The Crawley Transport Modelling Study, June 2022, paragraphs 6.5.1 to 6.73 (Submission Document Reference: ES/ST/01a) projects a 9% reduction in car trips to or from the sites included in the Local Plan (representing the impact of design and travel plan measures) although the trip reductions would vary by trip distance, together with a 5% reduction in car trips taking place within the borough (associated with wider behavioural changes). The trip length-based reductions were informed by the Sustainable Travel Towns study (Post-Submission Document Reference: PS/ES/ST/06). These assumptions are described in the Study as 'conservative' and 'achievable', but also depend on the implementation of suitable measures, including site-specific design and travel planning measures, including requirements of Policy ST1: Development and Requirements for Sustainable Transport, Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) as well as wider improvements in bus, cycling and walking infrastructure.
- 10.5.3 The identification of this pathway to a reduction in vehicular trip levels is informed in particular by the Crawley Local Walking and Cycling Infrastructure Plan, 2021 (amended 2023) (Post Submission Document Reference: PS/ES/ST/03) which identifies routes and costings for a range of schemes across the borough. However, the Crawley Transport Modelling Study, paragraphs 6.10.15-6.10.19 and Table 6-2 on pages 71-73 also notes that bus infrastructure and priority measures (including example schemes provided) would be capable of having a similar impact in reducing car trips.
- 10.5.4 In addition to this the West Sussex Transport Plan 2022-2036, 2022, pages 70-71 (Post-Submission Document Reference: PS/DS/WS/04) sets out a number of short, medium and longer term priorities which are intended to exploit the opportunities

arising from Crawley’s acknowledged strengths and potential in terms of non-car travel, including bus priority measures, interchange improvements, and active travel corridors.

- 10.5.5 In accordance with this approach the Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/07) identifies a number of specific sustainable transport schemes as ‘critical’ schemes, contributing to the mitigation of the impacts of the Local Plan strategy, including:
- Improvement to Three Bridges Railway Station
 - LCWIP route A – Gatwick Airport to Manor Royal
 - Manor Royal bus lane (Manor Royal West)
 - Station Gateway Road Network Improvement/ development – Bus & Rail Shelter
 - Western Boulevard Sustainable Transport Improvements
 - Upgrade to Gatwick Airport Railway Station
- 10.5.6 Following the submission of the Infrastructure Delivery Schedule there has been further engagement on this document with West Sussex County Council and National Highways, and an updated version is proposed/submitted, the Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08). (It should be noted that this reclassifies the Manor Royal bus lane and Station Gateway Road Network Improvement/ development – Bus & Rail Shelter schemes as ‘Essential’.)
- 10.5.7 This places a number of sustainable transport projects in the category of ‘Essential’, defined as *‘Infrastructure which is required in order to mitigate the development identified in the Local Plan, but where there is greater flexibility regarding the scope or timing of the project, or where there is potential for the projects to be substituted by alternatives.’* This reflects the fact that (unlike the ‘critical’ highways projects) they are not specifically identified by the Crawley Transport Modelling Study or required in order to make individual developments acceptable in planning terms. However, they do represent a package that is judged adequate to support the projected level of mode shift away from the car, and which aligns significantly with the West Sussex Transport Plan priorities for the Crawley Area (please also see answer to Question 10.24 below). These are as follows:

Project	Summary	Projected Timing
Improvement to Three Bridges Railway Station	Improved bus/rail interchange; highways alterations; improved pedestrian and cycling footways and access	Short Term (2023/24 onwards) (Benefits from resolution to grant planning permission subject to S106 – see ref CR/2022/0783/FUL)
Station Gateway Phase 1	Improved bus facilities / segregation at Crawley Bus Station	Short Term (2023/24 onwards) (Public consultation planned for early 2024)
Western Boulevard Sustainable Transport Improvements	Improved connectivity for cyclists/pedestrians and facilitation of bus movements	Short Term (2023/24 onwards) (Has planning permission – see ref CR/2022/0256/RG3)

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Project	Summary	Projected Timing
Fastway Hydrogen Route 10 and 20 Bus running Improvements	Programme of small-scale interventions along key Fastway routes (e.g. removing small obstacles, works to kerbs) to improve flow	Short Term (2023/24 onwards) (Visits to define scope of works currently under way)
Manor Royal bus lane	Bus Service Improvement Plan project for bus lane in Manor Royal West	Short Term (2023/24 onwards) (Programmed to be completed in next 2 years)
Fleming Way bus lane	Bus lane eastbound from Faraday Road to London Road	Medium Term (2029 onwards)
LCWIP Route A – Town Centre to Manor Royal	Southern section of arterial active travel corridor connecting Town Centre with Gatwick Airport	Medium Term (2029 onwards)
LCWIP Route A – Manor Royal to Gatwick Airport	Northern section of arterial active travel corridor connecting Town Centre with Gatwick Airport	Medium Term (2029 onwards)
LCWIP Route B – Pound Hill to Manor Royal via Forge Wood	Active travel corridor connecting Pound Hill and Forge Wood neighbourhoods with Manor Royal and with LCWIP Route A	Medium Term (2029 onwards)
LCWIP Route N – Town Centre to Lowfield Heath via Manor Royal	Arterial active travel corridor providing western connection between Town Centre and Lowfield Heath, via Manor Royal	Medium Term (2029 onwards)

10.6 Question 10.6: What evidence is there to suggest that local energy infrastructure will support the levels of electric vehicle charging set out in Policy ST1?

- 10.6.1 Crawley Borough Council (CBC) has engaged with UK Power Networks, the District Network Operator for the Crawley area, regarding the Infrastructure Plan, July 2023 (Submission Document Reference: KD/IP/01), and potential constraints on proposals in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) on account of local grid capacity. They have indicated that a required upgrade for Bolney Super Grid Transformer is programmed for implementation in 2026 and have not identified any further overarching constraint on the Local Plan proposals.
- 10.6.2 CBC does not in any case consider that Policy ST2: ‘Car and Cycle Parking Standards’ of the Crawley Borough Submission Local Plan will in practice require a level of provision of electric vehicle charging points in excess of what is now required nationally under Building Regulations Approved Document S (Post-Submission Document Reference: PS/ES/ST/05).
- 10.6.3 This is because the Policy refers to the Parking Standards Annex in the plan, which sets out requirements for the provision of EV charging within parking spaces, but states that these are applicable ‘Until the introduction of national requirements for EV charging infrastructure in new developments, through Building Regulations or otherwise’. Therefore, the introduction of Approved Document S is considered to have superseded the Local Plan standards, although these were retained in the

submission draft owing to a degree of regulatory uncertainty associated in particular with the passage of through Parliament of the Retained EU Law (Revocation and Reform) Act 2023.

10.6.4 Subsequent to the Act receiving royal assent in its final form on 29 June 2023, and confirmation that the operation of Part S is unaffected, the council proposes to modify Policy ST2 and the Parking Standards Annex by removing reference to Electric Vehicle charging infrastructure, as follows:

The main policy text amended as follows:

Policy ST2: Car and Cycle Parking Standards

Development will be permitted where the proposals provide the appropriate amount and type of car and cycle parking (~~including electric vehicle charging infrastructure~~) to meet its needs when it is assessed against the borough council's car and cycle parking standards. These standards are contained in the Parking Standards Annex to this Plan.

Car parking standards for residential development are based on the accessibility of the area, the levels of car ownership, and the size of any new dwellings.

Parking standards for other types of developments will be based on the particular usage of the premises, which will take account of the intensity and requirements of each use and the accessibility of an area by public transport and other sustainable modes.

In the Parking Standards Annex to the Local Plan the electric vehicle charging infrastructure requirements on page 298 are amended as follows:

Electric Vehicle Charging Infrastructure

Provision of EV charging infrastructure as part of new vehicular parking should be made in accordance with Building Regulations, with EV charge points being designed and located in a manner appropriate to the requirements of the development.

~~Until the introduction of national requirements for EV charging infrastructure in new developments, through Building Regulations or otherwise, provision should be made as follows:~~

- ~~• 'Active' charging points for electric vehicles should be provided on a set proportion of car parking spaces, in accordance with the following table. This is based on West Sussex County Council Guidance on Parking at New Developments (2019), and is informed by the government's intention that 50% – 70% of new car sales should be ultra low-emission by 2030;~~
- ~~• Ducting provided at all remaining spaces where appropriate to provide 'passive' provision for these spaces to be upgraded in future.~~

Year	Proportion of 'active' charging points
2020	28%
2021	33%
2022	37%
2023	41%
2024	45%
2025	49%
2026	53%
2027	58%
2028	62%
2029	66%
2030	70%

10.6.5 This proposed modification is set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).

10.7 Question 10.7: Does the plan make sufficient provision in Policy ST2 and its Parking Standards Annex to provide lesser amounts of vehicle parking in mixed use developments, or higher-density housing development, in favour of other modes of transport?

10.7.1 Crawley Borough Council (CBC) considers that Policy ST2: 'Car and Cycle Parking Standards' of the Crawley Borough Submission Local Plan (Submission Document Reference: CBLP/01) and the Parking Standards Annex, when read as a whole are sufficiently flexible to support the provision of lower amounts of parking in mixed-use developments and higher-density housing development, where this can be justified in terms of transport accessibility and travel plan measures, notwithstanding the proposed 'zonal' standards.

10.7.2 For example, the Parking Standards Annex opens with the following text, on page 295 of the Crawley Borough Submission Local Plan:

'The standards set out below are indicative minimum standards, setting out the level of provision which the council will generally expect in new developments.

Where a lower level of provision is proposed, the council will expect this to be justified on site-specific grounds, including (where appropriate) evidence concerning the accessibility of the location.'

10.7.3 Further, the introduction to the zonal standards for dwellings sets out that:

'...the standards should be applied flexibly where there are significant variations in parking demand within a zone, for example, where there are clear variations in density between neighbouring areas of housing, or in those zones which include parts of the Town Centre, where significantly lower levels of demand and parking will be expected.'

10.7.4 The zonal office standards detailed on page 296 are qualified in a similar way, as follows in the supporting notes:

10.7.5 *'These standards are indicative and are intended to reflect likely demand. Provision below these standards may be acceptable if it can be demonstrated how the total access needs of the development can be met.'*

Issue 2: Whether the plan's approach to the Crawley Western Multi-Modal Transport Link at Policy ST4 is sound.

10.8 Question 10.8: Is the principle of an area of search justified? Is it necessary for plan soundness, having regard to the evidence base (documents at ES/ST/02 - the various SYSTRA reports), that a narrower area of search or preferred option for the route alignment is identified?

10.8.1 The Crawley Western Multi-Modal Transport Link is not required to support any development proposed within the Crawley Submission Local Plan. However, Crawley Borough Council (CBC) believes, as is set out in the council's Written Statement to the Inspectors' Matters, Issues and Questions: Matter 2: Spatial Strategy, Question 2.7, pages 13-14 (Examination Document Reference: CBC/MIQ/002), that delivery of

the Western Link is necessary in order to ensure any further strategic development on the borough's administrative boundaries does not impact negatively on Crawley's existing transport network. Its timely delivery also ensures that residents can take advantage of the new route and its public transport and active travel options from the outset, without establishing travel behaviours which have to be changed later. However, this requirement is linked to development proposals outside the borough's administrative boundary. Therefore, whether a site for the strategic development is allocated, along with the timing and scale for any such development, is outside CBC's control.

- 10.8.2 The principle of a comprehensive Crawley Western Link: the Crawley Western Multi-Modal Transport Link, connecting the A264 south of Kilnwood Vale neighbourhood with the A23 to the north of County Oak in Crawley, has been considered over a long period of time in order to support development to the west of the borough. The concept was initially considered as part of the West Sussex Structure Plan 2001 and was a requirement of Policy NE17 (Post-Submission Document Reference: PS/DS/WS/04).
- 10.8.3 Whilst the transport modelling for the West of Bewbush Joint Area Action Plan concluded that the Crawley Western Link Road was not required for the development at West of Bewbush alone (now Kilnwood Vale neighbourhood), it concluded that land should be safeguarded for the route should there be further development to the west of Crawley. The West of Bewbush Joint Area Action Plan, 2009 (Post-Submission Document Reference: PS/DS/JAAP/01) safeguarded land through the site for a Western Relief Road (Policy WB 23, pages 51-52). This land was subsequently granted permission (Horsham District Council Planning Application reference: DC/17/2481) for residential development contrary to CBC objections to the loss of the reserve land (Horsham District Council Planning Committee Report: PS/DS/JAAP/02 and Crawley Borough Council Decision Letter to Horsham District Council Consultation: PS/DS/JAAP/03).
- 10.8.4 Critically, as the development to the west of Crawley is coming forward incrementally, the developers for each stage are seeking to suggest that each scheme, on its own, is not severely impacting the existing infrastructure, despite the baseline being already over capacity. Without a coordinated and strong commitment to the delivery of the comprehensive transport link, strategic development adjacent to Crawley will continue to connect directly into the already congested, existing road network through Crawley. This will bring additional traffic into the town, whereas the Western Link would direct longer distance vehicular movements and Fastway bus opportunities to the Main Employment Locations of Manor Royal and Gatwick Airport, as well as joining the strategic road network further north. Sustainable transport would be improved by direct public and active travel options from the new neighbourhoods into the town.
- 10.8.5 Crawley Borough Submission Local Plan, May 2023, paragraph 17.20 (Submission Document Reference: CBLP/01) confirms that the transport modelling indicated that there are a number of junctions within the borough which are already at capacity, based on the quantum of development coming forward within Crawley and being delivered in Mid Sussex and Horsham districts in their adopted Local Plans. The cumulative impacts of additional planned growth, including through the Horsham

District Plan review and Gatwick Airport's Master Plan 2019 on a single runway, will exacerbate issues on roads within Crawley.

- 10.8.6 In this historic and current context, CBC has had to make assumptions as part of preparing its evidence base for the Local Plan Review in order to consider potential in-combination impacts. This is to ensure the Local Plan can address any impacts which would arise from proposals outside the borough's administrative boundaries and any mitigation would be flexible and appropriate for the in-combination impacts as well as those arising from within the borough alone.
- 10.8.7 This has been a particularly important consideration with the Local Plans for Crawley borough, Horsham and Mid Sussex district coming forward at a similar time. Therefore, there is potentially a risk of under-estimations of cumulative impacts should each authority only be considering the impacts of their Local Plan development on existing planned growth levels within the adopted Local Plans.
- 10.8.8 This risk has also been managed through the Duty to Cooperate discussions, West Sussex County Council consistent advice across the three authorities, engaging Horsham District Council as a key stakeholder in the preparation of the Crawley Western Link Road Study (Submission Document Reference: ES/ST/02) and, for Crawley and Horsham, using the same transport modelling consultants. In particular, it will be for the neighbouring authorities to ensure their Transport Modelling assesses the most up-to-date development levels arising from within Crawley, including those being promoted through the Crawley Local Plan Review, and to address any mitigation requirements coming forward from schemes which have impacts on the Crawley highway infrastructure.
- 10.8.9 However, in order to demonstrate the potential impact on the Crawley highway network from development immediately adjacent to the borough, the Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a) tested Scenario 3. This was as Scenario 2 (i.e. 6,720 dwellings within Crawley and the Gatwick Green employment allocation) plus West of Ifield (3,750 Dwellings), West of Kilnwood Vale (1,546 dwellings) and 50,000 square metres of employment leading to 12,016 dwellings at 751 dwellings per annum in this scenario.
- 10.8.10 West Sussex Transport Plan 2022 – 2036, page 43 (Post-Submission Document Reference: PS/ES/ST/04) identifies major road enhancements with active travel infrastructure – including A24 corridor, A264 corridor and Crawley Western Link Road as a Medium Term (2027-32) Active Travel Priority, and, page 54, as a Medium Term Road Priority. Paragraph 7.82, page 70, confirms that *“a Crawley Western Link Road (CWLR) has potential to support strategic economic and housing growth in Crawley and Horsham subject to future planning decisions. The vision for CWLR is for a multi-modal link road between the A264 and A23 that supports additional Fastway style bus services through extensive bus priority measures alongside active travel facilities. This vision will continue to be developed with local stakeholders to ensure that the scheme is deliverable and performs both transport and place-making roles”*. On this basis, a Crawley Western Link Road (including shared transport and active travel facilities) is identified as a Medium Term priority for Crawley, page 71 and Horsham, page 75. In relation to Horsham, paragraph 7.106, page 75, confirms that *“in the medium term and subject to local planning decisions, it is anticipated that a*

Crawley Western Link Road (CWLR) will come forward as a development-led scheme to unlock potential strategic employment and housing development in Horsham and Crawley. The vision for CWLR is for a multi-modal link road between the A264 and A23 that supports additional Fastway style bus services through extensive bus priority measures alongside active travel facilities. This vision will continue to be developed with local stakeholders to ensure that the scheme is deliverable and performs both transport and place-making roles”.

- 10.8.11 Therefore, CBC has undertaken an initial study into the section of the Multi-Modal Transport Corridor which would run through Crawley borough – the Crawley Western Link Northern Area Search Study, 2023 (Submission Document Reference: ES/ST/02). This supports the Crawley Borough Submission Local Plan Policy ST4 and Local Plan Map identification of an Area of Search through which deliverable routes could be found, taking into account the Local Plan policies, in particular the safeguarded area policies for the airport. It confirms that indicative route options will be achievable, subject to further detailed, technical feasibility work and consultations by the appropriate body responsible for delivery of the route.
- 10.8.12 The Crawley Western Link Northern Area Search Study looks in detail at the area within Crawley where a route would have to run to connect to the A23. A constraints mapping exercise was initially undertaken to identify the constraints along the study corridor. This informed the development of route options. The routes identified throughout the study are indicative only for the purposes of assessing a reasonable range of possible options, and do not suggest a preferred or final route option in any case. This is because more detailed technical work and consultation is required to understand scheme impacts and delivery risks before a preferred option can be selected.
- 10.8.13 The route options are shown in the report to facilitate the refining of the Area of Search shown on the Local Plan Map, and its associated Local Plan Policy, to support further work on identifying and assessing specific route alignments and then progressing a multi-modal transport link, should significant strategic development to the west of Crawley’s administrative boundaries come forward. Given the range of options which are available for future detailed consideration, all have a range of deliverability issues that would need to be overcome so it would not be appropriate to define a narrower area of search at this stage. Further consideration of the options and selection of a preferred option would need to be undertaken by a delivery body, such as West Sussex County Council, who would be responsible for any associated financial and legal risks of the scheme.
- 10.8.14 The Horsham Local Plan had not reached Regulation 19 Stage at the point of the Crawley Borough Local Plan’s submission for Examination. It has not yet been established whether strategic development immediately adjacent to Crawley’s administrative boundaries to the west of the borough is an appropriate strategy for Horsham. Therefore, undertaking detailed work in relation to the exact route a Crawley Western Link Transport Corridor would be premature and potentially costly unnecessary work. However, leaving the Crawley Borough Local Plan silent in relation to this major scheme would also be potentially detrimental because the Crawley Local Plan should set out spatial priorities for the future of the borough, to inform residents, landowners and stakeholders. On this basis, it was considered by

CBC and WSCC appropriate, and necessary, to confirm the feasibility of route options through the section which would fall within Crawley Borough in order to establish an Area of Search for future detailed work. This was considered important due to the known constraints within this area, particularly, but not restricted to, Gatwick Airport Safeguarding.

10.9 Question 10.9: Is the area of search justified having regard to Gatwick Airport's masterplan, land ownerships, environmental designations and features and residential amenity? Is the interim approach to the eastern end of the route a pragmatic solution that would enable a future potential southern runway or an ineffective, costly and unjustified complexity that would present a significant level of risk to delivering a western link?

10.9.1 Crawley Borough Council (CBC) and West Sussex County Council (WSCC) prepared the brief against which the consultants would undertake the Crawley Western Link Road Study. This was formed following the representations received during the Additional Publication Regulation 19 consultation undertaken in 2021. In particular, concerns raised from Gatwick Airport Limited (GAL) and WSCC at that stage.

Consultation and Engagement with Key Stakeholders

10.9.2 In order to adequately address the requirements of the brief, the consultants took an engagement-led approach, preparing a consultation document from the very start.

10.9.3 Stakeholders have been involved throughout the Crawley Western Link study. In particular, stakeholders were involved in the constraints' identification and route options development through several workshops during September 2021. During these workshops no additional route options were identified and it was accepted that the numerous options developed substantially represent the best potential route alignments possible under the constraints considered, though refinement of these may result in variations thereof, or additions.

10.9.4 Additionally, the option sifting was discussed with the major Stakeholders (Crawley Borough Council, Environment Agency, GAL, Homes England, Horsham District Council and WSCC).

10.9.5 GAL requested some of the Route Options to be sifted out, including the interim options as their alignments would likely encroach into the operational area of potential Gatwick Airport southern runway. However, they were retained to be considered further in more detail.

10.9.6 It is also worth noting that some of the other remaining live Options encroached slightly into the current safeguarded land related to Gatwick Airport, but GAL acknowledged that future design development work is required for both the CWLR and the Gatwick southern runway Masterplan and therefore options in the middle section did not need to be sifted out at this stage, see paragraph 10.9.13 below.

10.9.7 The Crawley Western Link Northern Area Search Study, 2023 (the Study) paragraph 1.2.5 (Submission Document Reference: ES/ST/02) confirmed that stakeholder engagement was key to all the stages of the study. The original study brief was agreed with each of the stakeholders who were then engaged at all stages of the study to elicit their knowledge and discuss the development of the corridor.

10.9.8 The presentations and responses from the stakeholders are included in the Study as appendices H, I and J (Submission Document References: ES/ST/02a, pages 50-52, and ES/ST/02h-m).

Constraints

- 10.9.9 Section 3 of the Study and Appendix A summarise the existing constraints known within the northern section of the route. Paragraph 1.2.3 confirms that following the development of route options, a two-step option evaluation stage was then performed. Firstly, a binary Sifting Stage was used to remove route options based on three criteria which warranted them to be eliminated. Criteria included the extents of encroachment into safeguarded land related to Gatwick Airport, the identification of better route options based on pairwise comparison and the level of public transport and pedestrian/cycle infrastructure provided.
- 10.9.10 Paragraph 1.1.1 confirms that the purpose of the Study was to optimise the Area of Search corridor for the northern section of the Crawley Western Link Road (between Charlwood Road and the A23 London Road) to minimise encroachment into the safeguarded land related to a further wide-spaced runway to the south of Gatwick Airport (GAT 2 safeguarded land) and other existing development as far is technically and financially feasible. Where encroachment is unavoidable the aim of the study was to seek to reach agreement with all affected major stakeholders i.e. Crawley Borough Council (CBC), Gatwick Airport Limited (GAL), Horsham District Council (HDC), and West Sussex County Council (WSCC).
- 10.9.11 Section 3.2 of the Study summarises the Gatwick Airport Masterplan. The initial sifting approach removed routes where encroachment into the safeguarded area would be likely to intrude into the operational airport area and affect the ability of GAL to provide an expanded southern runway design (paragraph 6.1.1). Table 1 shows the options sifted out at this stage on this basis.
- 10.9.12 Section 6.3 explains the stakeholder discussions which then took place in relation to the initial sifting stage. This section confirms the additional work carried out following this, and the options which were retained which involved some encroachment into safeguarded land, including those which were retained for the study contrary to GAL requests.
- 10.9.13 GAL's representation, Consultation Statement Appendix 8, page 829 onwards, maintained its objection, and appended its detailed response to the Study (REP/056, 2023). This response and engagement with GAL during the process maintained a clear objection to any area of search encroaching into safeguarding but with some acknowledgement that further design work would be required for both the highway and the airport infrastructure and therefore options in the middle section did not need to be sifted out at this stage. However, the interim options (ES3 and ES3a) for the eastern section were very strongly objected to by GAL, highlighting the significant challenges which would exist for the necessary diversion of the route to enable the southern runway to come forward.
- 10.9.14 The retention of the two routes where it is known that their alignments would likely encroach into the operational area of potential Gatwick Airport southern runway was given significant consideration. However, when considered alongside the alternative Eastern Section options, it was felt that there were substantial benefits

to these two route options which warranted their retention at the sifting stage to analyse their pros and cons during the following analysis stage.

- 10.9.15 CBC considers the benefits of the interim options which would avoid impacting on commercial properties in County Oak in the period before any southern runway may in the future come forward. This may be beyond 2050 given the capacity now proposed through the Northern Runway Project (or never) and the advantages of an interim solution could potentially outweigh the additional cost of diverting the route in the future. Paragraph 17.30 of the Submission Local Plan recognises this concern, stating that the benefits of the interim options would need to be considered carefully, at the point of route feasibility assessment, against the costs of re-providing the route should a southern runway be progressed, and that agreement with GAL would form an essential part of this further work. This is considered below in more detail (see paragraphs 10.9.20 – 10.9.28 below).
- 10.9.16 Paragraph 1.2.5 of the Study explains that *“private land owners were not consulted as part of this commission based on the early stage of the scheme and that the Area of Search would be consulted on through Local Plan consultation and examination. It is expected that further detailed consultation directly with potentially affected landowners will take place during future stages in the delivery of the route”*. The landownership affecting different parts of the route may influence the decision on which options within the Area of Search are pursued in future, but they did not affect the choice of route options.
- 10.9.17 Section 3.3 of the Study summarises the River Mole floodplain. Engagement with the Environment Agency included meetings where the emerging study was presented, and their detailed comments received are set out in: Appendix I (Submission Document Reference: ES/ST/02h).
- 10.9.18 Section 3.4 of the Study summarises the Environmental Designations and Locally Designated Features.
- 10.9.19 Residential Amenity and impact were considered as part of the Multi-Criteria Assessment stage (paragraph 7.2.1, Table 2). A weighting factor of 3 was placed on these criteria to help align the scoring with the factors which are most important to the Transport Link scheme.

Interim Area of Search Approach: Eastern End

- 10.9.20 Route options for the eastern section of the link within Crawley, linking through or around County Oak to the A23, were the most complex. The Study confirms that 19 route options in total were considered some of which were sifted out during the Option Sifting process as described in Chapter 6 of the Study. This Option Sifting process was based on the following three sifting criteria:
- **Considerable safeguarded land encroachment:** Encroachment into the safeguarded area which is likely to intrude into the operational airport area and affect the ability of GAL to provide an expanded southern Runway design,
 - **Pairwise comparison:** Options have been discounted if there is an alternative option which has all the same negative aspects, but with additional positive aspects, also considering the strategic stage of the scheme which we are currently at which doesn't preclude future iteration and alterations being explored, and

- **Inadequate public transport and pedestrian/cycle provision:** A key priority for the CWLR is to provide a corridor which supports sustainable transport. Not being able to provide this due to cross-sectional constraints is considered a sifting criteria.

- 10.9.21 Therefore, CBC considers that the Study has evaluated and accounted for the impact of the different options on Gatwick Airport Limited safeguarded land to ensure that no option would firmly preclude possible future runway expansion of Gatwick Airport.
- 10.9.22 Through this sifting process, several options were discounted, reducing the number of options for the eastern section from 19 to 10. These remaining 10 options were then further evaluated with the detailed Multi-Criteria Assessment.
- 10.9.23 The study (paragraph 7.9.3) confirms that the Multi-Criteria Assessment demonstrated that the interim option in the Eastern Section could have substantial positive aspects in comparison to the other Eastern route options. However, it was acknowledged that these options are unlikely to be able to co-exist with a Gatwick southern runway, but the possible significant interim positives prior to a potential future southern runway expansion may warrant further investigation. In this instance, it was agreed that an alternative option post-southern runway implementation must also be agreed upon as part of a business case analysis in order to ensure the interim approach would be a feasible option.
- 10.9.24 By implementing the interim solution, the existing County Oak Industrial Area would remain unchanged and all the existing business would be retained for a considerable period. This industrial area is a high employing area providing numerous jobs which could be lost in the eventuality of the link road running through this estate.
- 10.9.25 Providing an interim option would also provide environmental benefits by reducing the number of buildings that will need to be removed in the short term (in County Oak) as a direct consequence of the link road as well as the buildings that may need to be removed due to the increase in severance within the industrial estate.
- 10.9.26 Additionally, the Interim Area of Search does not imply that certainly a route will be provided in that area but instead it suggests that possible routes, which will require more examination, may be feasible before and if Gatwick expands.
- 10.9.27 Finally, when and if Gatwick expands, some existing business in County Oak will need to be removed. This may provide different opportunities for the the link road to be diverted through the industrial estate and to the south of the expanded Gatwick Airport.
- 10.10 [Question 10.10: Would a route within the area of search be deliverable in principle and would Policy ST4 be effective in securing its delivery?](#)
- 10.10.1 Crawley Borough Council (CBC) believes that the Study establishes the principle that a route through Crawley borough is deliverable and confirms that the Area of Search offers opportunities and options which can be explored in more detail. The Crawley Western Multi-Modal Transport Link is not required to support any development proposed within the Crawley Submission Local Plan.

- 10.10.2 By establishing the Area of Search in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) through Policy ST4 and showing it on the Local Plan Map, it can support the design of the section of the route which would be located in Horsham district. In particular, the critical matter here is the crossing of the River Mole, and ensuring the link can be provided with minimum impact on the amenity of neighbouring residential properties (as set out in the council's response to Question 10.9 above).
- 10.10.3 As set out above in the council's response to Question 10.9, the Crawley Western Link Northern Area Search Study, 2023, paragraph 1.2.5 (Submission Document Reference: ES/ST/02) confirmed that stakeholder engagement was key to all the stages of the study. The original study brief was agreed with each of the stakeholders who were then engaged at all stages of the study to elicit their knowledge and discuss the development of the corridor.
- 10.10.4 The presentations and responses from the stakeholders are included in the Crawley Western Link Northern Area Search Study as appendices H, I and J (Submission Document References: ES/ST/02a, pages 50-52, and ES/ST/02h-m).
- 10.10.5 Horsham District Council and Homes England were identified as key stakeholders in order to ensure that the study has been based on a design of the route which reflects the aspirations and intentions of the remainder of the route which would run through Horsham district (explained in more detail in the council's response to Question 10.11 below).
- 10.10.6 West Sussex Transport Plan 2022 – 2036 43 (Post-Submission Document Reference: PS/ES/ST/04) includes the Crawley Western Multi-Modal Transport Link as a Medium Term priority. This ensures the proposal will be considered as a strategic priority for the county over the period 2027-32, during the Local Plan period. Delivery of the scheme will be subject to confirming deliverability through a future business case, securing the necessary funding from development and central government, and all relevant statutory processes.
- 10.11 [Question 10.11: Does the proposed route safeguarding provide an effective approach that strikes an appropriate balance between not precluding strategic options 'At Crawley' coming forward whilst at the same time providing sufficient certainty as to what could occur within this part of the Borough?](#)
- 10.11.1 Crawley Borough Council (CBC) has identified an Area of Search for a Crawley Western Multi-Modal Transport Corridor through the section of the route which would fall within Crawley, on the basis of known strategic proposals to the western side of Crawley's administrative boundaries. Horsham District Council and Homes England were identified early on as key stakeholders to support the refinement of the Area of Search. West Sussex County Council supported CBC with the commissioning and technical guidance throughout the Crawley Western Link Northern Area Search Study, 2023 (ES/ST/02). This has ensured that the study has been based on a design of the route which reflects the aspirations and intentions of the remainder of the route which would run through Horsham district.
- 10.11.2 Critically, the study considered land which falls into Horsham district to ensure the crossing of the River Mole and into Crawley borough would be feasible and any

design of the middle section would be considered in light of these findings. On this basis, paragraph 3.1.1 of the study confirmed that the Study Area is between Charlwood Road (in Horsham district) and the A23 London Road (in Crawley borough). This covered the “northern” section of the route, linking to the middle section proposed by Homes England as part of their West of Ifield scheme (Figure 1, page 7 of the study).

- 10.11.3 Crawley Borough Submission Local Plan, May 2023, paragraph 17.24 (Submission Document Reference: CBLP/01) confirms that without commitment to a full Western Multi-Modal Transport Link between the A264 and the A23 (north) all of the traffic from any development to the west of Crawley is likely to feed into residential roads in Ifield and/or Langley Green and on to the already congested A23 junctions. The Local Plan is clear that connections from any strategic development into Crawley borough should not include any new highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Green Space.
- 10.11.4 Instead, paragraph 17.25 explains that a Western Multi-Modal Transport Link would enable prioritisation of connectivity by more direct routes for public transport, cycling and walking into Crawley from any new development, with vehicular traffic having to take a longer route along the Western Link. The Transport Link is seen as also providing a sustainable corridor to promote public transport and active travel to key employment areas within Crawley (paragraph 2.2.5, page 7). The Crawley Western Link Northern Area Search Study, Section 4, utilises the design of the route to meet the aspirations and expectations for an all-purpose dual carriageway multi-modal link inclusive of one traffic lane and one bus lane in each direction, along with walking infrastructure and cycling facilities provided on each side of the carriageway (paragraph 4.1.1, page 13). This approach was designed with Homes England in order to ensure consistency (paragraph 2.2.5).
- 10.11.5 Without the Area of Search within Crawley, there wouldn't be sufficient certainty for proposals in Horsham to be designed against, which could result in missed opportunities, or at worst, incompatible layouts generating additional costs and/or compromised schemes. The success of the approach for increasing public transport and active travel modal share across the wider area relies on an efficient and well-designed comprehensive network, which would include the provision of the Western Multi-Modal Transport Link as part of strategic development located to the west of Crawley.
- 10.12 [Question 10.12: Would it be necessary for soundness to extend the area of search for the link further east to Gatwick Road?](#)
- 10.12.1 The Crawley Borough Local Plan, paragraph 12.23(ii), page 159-160 (Submission Document Reference: CBLP/01) confirms Crawley Borough Council (CBC) will support housing development through urban extensions on or close to the western side of Crawley's administrative borough boundaries where the scoping, design and delivery of the comprehensive Western Multi-Modal Transport Link is agreed and provided. This establishes the extent of the route as connecting from the A264 to the A23, north of County Oak. This is reflected in the Area of Search shown on the Local Plan Map for the section which would be located within Crawley borough (Policy ST4, page 244).

- 10.12.2 The connection with the A23, north of Fleming Way/County Oak, has been the main destination point considered by the councils as part of this scheme. One of the main destination points in Crawley is reached at this point, the Manor Royal Main Employment Area. Beyond this point, the A23 London Road forms a less congested dual carriageway link to Gatwick Airport to the north so a connection to Gatwick Road is not currently needed. Should a southern runway come forward, the A23 will be realigned further south and land is safeguarded in Policy GAT2 to enable this to take place.
- 10.12.3 From a technical perspective, London Road represents a better route onto the A2011 as it is made of a two-lane dual carriageway. This would mean having two lanes of traffic in each direction which compared to Gatwick Road (one-lane traffic in each direction) would provide more capacity and potentially less congestion. Additionally, Gatwick Road is heavily used by buses. This road is characterised by partial and intermittent bus lanes which service six bus lines while London Road has half the bus lines. Connecting the Western Link Road to Gatwick Road would seriously increase the traffic on this single carriageway road leading to potential impacts on bus journeys. Increasing bus journey time and reducing the reliability of public transport, would be fundamentally in contrast with one of the main objectives of the Western Link Road which is aiming to lead a transport modal shift and to provide reliable public transport.
- 10.12.4 It is likely that the majority of the traffic using the link will continue to destinations served by the A23 either directly or via turning onto Fleming Way and other access routes. The A23 would certainly be the quicker and more direct route for traffic continuing on London Road past and to the airport, beyond the junction of Gatwick Road with London Road. A smaller proportion of traffic would continue through to Gatwick Road to reach premises served from that route.
- 10.12.5 Whilst continuing the Link Road to Gatwick Road could provide some relief and benefit for Fleming Way and the section of London Road linking to Fleming Way from the Link Road, this seems unlikely to be sufficient traffic movement or relief to justify the cost of an additional 1.3Km (as far as James Watt Way) to 1.6Km (separate alignment to Gatwick Road) of new road. Hence, it is likely that such an extension would fail to achieve a positive Benefit Cost Ratio if it were tested to attract funding and could contribute to making the project potentially unaffordable.
- 10.12.6 Therefore, it is not necessary to consider a route further east to Gatwick Road and it wouldn't contribute positively to Plan viability or soundness.
- 10.13 [Question 10.13: Is the wording of Policy ST4 sufficiently robust to ensure any route and its design takes account of environmental assets including, but not limited to, ancient trees/woodland not yet identified in any recognised inventory and proximate protected sites such as Local Green Space, Local Wildlife Sites and Local Nature Reserves?](#)
- 10.13.1 Crawley Borough Council (CBC) believes that Policy ST4a of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) clearly refers to local biodiversity. When read as a whole, the Crawley Borough Submission Local Plan already sufficiently protects environmental assets, through

Policies GI1, GI2, GI3 and GI4. These would all apply in the case of further work to consider the design and route of a Multi-Modal Transport Corridor.

10.13.2 The Crawley Western Link Road Study (Submission Document Reference: ES/ST/02) looked at the key environmental constraints in this area (see Chapter 3 – Existing Constraints) including but not limited to River Mole floodplain, ancient woodlands, biodiversity opportunity areas, local green spaces, local natural reserves, local wildlife sites and structural landscaping.

10.13.3 To provide an accurate and detailed evaluation of the impact of the Western Link Road on these constraints, the northern section has been divided in three sub-sections. This subdivision ensured that areas with high level of environmental constraints have been scored against similar routes with similar environmental constraints.

10.13.4 Additionally, each route option that was not excluded in the Sifting Analysis was then scored through a Multi-Criteria Analysis which included Environmental impact as scoring criteria, see Table 2, Page 30 of Crawley Western Link Road Study (Submission Document Reference: ES/ST/02). This criterion, evaluated '*To what extent does the link impact on the environment and on existing local constraints?*' Additionally, to the Environmental MCA criteria it was given a weighting factor of 3 (where 1 was the lower end and 3 the higher end) to ensure that the environmental constraints would have been adequately represented in the final scoring.

10.13.5 For clarity, the council would consider the following proposed Modification to the Reasoned Justification to the Policy:

[17.31 The Area of Search is located outside the Built-Up Area Boundary, within the Upper Mole Farmlands Rural Fringe, and includes areas of known environmental constraints including, but not limited to, the River Mole floodplain, ancient woodlands, biodiversity opportunity areas, local green spaces, local natural reserves, local wildlife sites and structural landscaping. The requirements and expectations of the other policies in this Local Plan and in national policy relevant to these constraints will apply in the circumstances of route identification and design for the Crawley Western Multi-Modal Transport Link.](#)

10.13.6 This proposed modification is set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).

10.14 Question 10.14: Is it necessary for soundness for Policy ST4 to require a multi-modal link west of Crawley to have regard to land safeguarded at Gatwick Airport at part a of the policy?

10.14.1 Crawley Borough Council (CBC) believes that when read as a whole the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) already sufficiently safeguards the land south of Gatwick Airport, through Policy GAT2. Paragraph 17.29 of the Local Plan recognises that the Study indicates potential examples where the route could fall outside of the safeguarded land completely, should this be necessary.

10.14.2 However, the council would not be adverse to including reference to safeguarded land and Policy GAT2 in Policy ST4. should this be considered necessary for addressing soundness in the Local Plan and for clarity.

10.14.3 It is suggested that this forms a separate criteria c. because the consideration for safeguarding is different to some of the other matters in the ST4a bullets. On this basis, the following modification is suggested to Policy ST4:

The design and route of the Western Multi-Modal Transport Link must take account of:

...

c. Land safeguarded at Gatwick Airport for potential future southern runway expansion.

10.14.4 This proposed modification is set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).

Issue 3: Whether there is sufficient infrastructure capacity or scope for planned improvements to support the plan's proposals and secure sustainable growth.

10.15 Question 10.15: With reference to the Infrastructure Plan (Document KD.IP.01), is the Plan based on a sound assessment of existing infrastructure capacity and future infrastructure requirements to ensure the plan's growth would be sustainable?

10.15.1 Crawley Borough Council (CBC) has engaged with Infrastructure providers and with their plans and proposals through various iterations of the Infrastructure Plan July 2023 (Submission Document Reference: KD/IP/01) in order to ensure that the growth proposed in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) is sustainable. On that basis, CBC considers that the Infrastructure Plan, supported by the proposed updated Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08) provides an accurate picture of current levels of provision, future needs, and the infrastructure required to be delivered in order to mitigate the impacts of growth.

10.15.2 More specific consideration of particular issues (particularly transport and education) is provided in the Crawley Borough Council and National Highways Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/15a); the Crawley Borough Council and West Sussex Statement of Common Ground, August 2023 (Post Submission Document Reference: SoCG/16); and the Northern West Sussex Statement of Common Ground, July 2023 (Submission Document Ref: SoCG/01). These documents identify areas where work is ongoing to ensure that growth will be supported by the necessary infrastructure. The DfT Circular 01/2022 Consistency Checklist (Submission Document Reference: SoCG/15b) further sets out how the Plan strategy accords with National Highways requirements in respect of a sustainable approach to planning for transport.

10.16 Question 10.16: Are there any key inter-dependencies between infrastructure issues and the development trajectories in the plan?

10.16.1 There are a number of key inter-dependencies between infrastructure issues and development trajectories included in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01). These are highlighted by the

identification of particular projects identified in the updated Infrastructure Delivery Schedule as 'critical', i.e. 'Specific infrastructure projects which are required to be delivered in order to enable the implementation of individual developments identified in the Local Plan, or the Local Plan strategy as a whole.' Projected timings for these projects are set out in the Gantt chart provided with the updated Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08).

- 10.16.2 Among these there are a number of ongoing developer-led improvements being brought forward as part of compliance with conditions attached to the Forge Wood development. These are required to mitigate the impacts of the (already permitted and ongoing) Forge Wood neighbourhood development. The largest of these are the committed works on M23 Junction 10 (currently out to tender and projected to be delivered 2024/25-2025/26) and the nearby Crawley Avenue/Balcombe Road link road (projected 2025/26-2026/27), and these are also necessary in order to provide access to the Strategic Road Network from the Gatwick Green Strategic Employment Location (see also the answer to Matter 4, Question 27). Access junctions and highways works will also need to be provided at Gatwick Green itself in order to comply with Policy EC4: 'Strategic Employment Location.'
- 10.16.3 Other inter-dependencies associated with 'critical' schemes identified in the updated Infrastructure Delivery Schedule are less direct but still key in terms of the overall infrastructure package for mitigation of cumulative impacts. These include:
- Existing programmed schemes on the highways network which are yet to be implemented but form part of the Reference Case (i.e. baseline) for the Crawley Transport Modelling Study June 2022 (Submission Document Reference: ES/ST/01a) and, therefore, are carried forward to the Local Plan scenarios: i.e. the Hazelwick Avenue/Crawley Avenue and 'Tushmore' roundabout schemes;
 - Additional highways mitigations needed as part of the mitigation package for the Local Plan scenarios, i.e. the Ifield Avenue/Crawley Avenue junction scheme; the M23 Junction 10 southbound merge; the M23 Junction 11 northbound diverge and merge;
 - Education provision needed to serve the population of the borough, including 4-6 forms of entry at secondary level, a projected 252 early years places, and approximately 14 SEND places;
 - Upgrades/enlargement to Crawley Waste Water Treatment Works.
- 10.16.4 Other schemes are identified in the updated Infrastructure Delivery Schedule as 'essential', since although they are proposed as part of the overall mitigation package, there is greater flexibility in respect of the timing or scope of the scheme, and greater potential for substitution of alternative measures. This is applicable in particular to the sustainable transport mitigations discussed in answer to Questions 10.5 and 10.24.
- 10.16.5 As set out in answer to Matter 5, Question 6, the growth of the airport as a single runway, two-terminal airport is not projected to involve additional inter-dependencies.

- 10.17 Question 10.17: In particular, does the housing trajectory take account of the impact of water neutrality in the short term prior to any updated Water Resources Management Plan and water utilities business plan for the period beyond 2025 and at the other end of the spectrum the potential need for upgrades to waste water treatment in the latter part of the plan period?
- 10.17.1 The Updated Housing Trajectory, December 2023 (Post-Submission Document Reference: PS/H/HD/14) for the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) takes into account the impact of water neutrality.
- 10.17.2 Crawley Borough Council (CBC) in its corporate capacity has made and continues to make good progress in accumulating offset credits in order to release sites affected by Water Neutrality. This means that although the impact of water neutrality has resulted in delays to the consenting of sites and an associated decline in housing delivery, it is anticipated that the housing delivery will recover quite quickly to a level more typical of the period before 2021/2022, and that the overall quantum of residential development able to be delivered over the whole Local Plan period will not (subject to the implementation of the on-site water efficiency standards detailed in Policy SDC4) ultimately be affected, as set out in Topic Paper 4: Housing Supply, July 2023, paragraph 3.10.3 on page 26 (Submission Document Reference: DS/TP/04).
- 10.17.3 It should also be borne in mind that a significant part of Crawley's projected housing supply is located in the Forge Wood area, which falls outside the Sussex North Water Resource Zone.
- 10.17.4 In respect of Crawley Waste Water Treatment works, as reflected in the wording of paragraph 8.11 of the Crawley Borough Submission Local Plan on page 100, and Infrastructure Plan July 2023, pages 13-14 (Submission Document Reference: KD/IP/01) there remains a degree of uncertainty about the timing and extent of the upgrades required, as processes related to the triggering, design, funding and programming of these largely occur outside the Local Plan process, in accordance with separate arrangements for the regulation of the water industry.
- 10.17.5 In this context, it is difficult to define or quantify how any associated delays or constraints on the occupation of new residential development could affect implementation of the housing trajectory. However, CBC suggest that the Local Plan strategy has a degree of flexibility to accommodate a 'flatter' or more extended housing trajectory, bearing in mind that:
- The identified five year housing supply includes an additional 10 per cent 'buffer', applied in accordance with paragraph 74 of the National Planning Policy Framework, 2021 (Submission Document Reference: PS/DS/NPPF/01), which is 'moved forward from later in the plan period'; and
 - The stepped housing trajectory set out in Policy H1: 'Housing Provision' of the Submission Crawley Borough Local Plan (both as submitted and as proposed to be modified as set out in the council's response to questions under Matter 6) allows for a more extended build-out of the identified housing land supply than is projected in the Housing Trajectory.

10.17.6 These factors enable the Local Plan strategy (particularly in respect of years 6-17 of the Plan period) to absorb a degree of delay arising from constraints associated with the Waste Water Treatment Works upgrade. However, CBC does not consider that there is enough clear evidence at this point to justify the further step of discounting the overall housing requirement on account of this issue.

10.18 Question 10.18: The evidence indicates that Crawley Waste Water Treatment Works (WWTW) are likely to reach capacity during the middle of the plan period and be subject to further permitting likely to require a tighter consent. Does the Plan provide a positive policy framework to enable additional / expanded waste water treatment facilities to be provided? Is there evidence that land needs to be allocated for waste water infrastructure to support the growth identified in the Plan?

10.18.1 Crawley Borough Council (CBC) would maintain that the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) provides a sufficiently positive framework to enable additional or expanded waste water treatment facilities to be provided, as and when necessary, during the Local Plan period.

10.18.2 In particular, Policy IN2: The Location and Provision of New Infrastructure expresses clear support for:

'the provision of new or improved Infrastructure in appropriate locations where the facilities are required to support development, where they improve the medium- or longer-term resilience of infrastructure in Crawley, or where they add to the range and quality of facilities in the town.'

10.18.3 CBC considers that this approach is sufficiently supportive, without requiring specific reference to waste water facilities within the policy.

10.18.4 As the Infrastructure Plan sets out on page 13, based on information from Thames Water, it may be possible to accommodate further capacity within the existing Waste Water Treatment Works given technological upgrades. CBC therefore considers that the current state of evidence on this issue (bearing in mind the uncertain scope and extent of the upgrades required) is insufficient to justify the allocation or safeguarding of land for the provision of new or expanded waste water treatment facilities.

10.18.5 With reference to the specific location of Crawley Waste Water Treatment Works, and the potential for expansion at that location, CBC would note as follows:

- The site falls outside the Built-Up Area Boundary and within the proposed area of Safeguarded land, and as such development would be subject to Policies CL8: 'Development Outside the Built-Up Area Boundary' and GAT2: 'Safeguarded Land';
- There is an area of Ancient Woodland/Local Wildlife Site to the north of the works, where Policy GI2: 'Biodiversity Sites' would apply;
- As set out in the CBC response to Matter 5, Question 6 (paragraph 5.6.3): if expanded facilities are needed, there is land immediately adjacent to the works in the ownership of Gatwick Airport, which is itself a significant and growing

source of discharge into the facility, with an interest in supporting expansion of the works as required to support its own operations.

- 10.19 Question 10.19: For secondary education is it still the case that 4-6 additional forms of entry are required to support the housing growth in the Plan? Have there been any reasonable options to positively allocate land, including expanding existing sites to accommodate this requirement? Is there now some reliance on sites close to Crawley in neighbouring authorities to provide for Crawley's secondary education needs? Is there a reasonable prospect of existing sites in Crawley being able to cater for additional places through permanent or temporary expansion?
- 10.19.1 The current position regarding the existing and future education provision within Crawley borough is set out in the Infrastructure Plan, July 2023, pages 22-24 (Submission Document Reference: KD/IP/01) and the Northern West Sussex Statement of Common Ground, July 2023, pages 5-7 (Submission Document Reference: SoCG/01). This information is taken from the annually updated document prepared by West Sussex County Council (WSSCC), Planning School Places (2023).
- 10.19.2 As a result of significant growth in primary numbers during the period 2012 to 2022, Crawley has a recognised unmet need for secondary education of around 4-6FE.
- 10.19.3 Funding for a new secondary free school was approved by the Secretary of State in spring 2017 to serve Crawley to be delivered by the Department for Education depending on site availability and other factors. Following an extensive site search exercise by CBC, WSSCC and LocatED, an Arms-Length Body to the Department for Education responsible for buying and developing sites to help deliver new school places, no suitable site for a school was found due to the constrained nature of the borough. The most suitable option was considered to be within new strategic development west of Crawley. This could provide the opportunity for a 6-8 FE secondary school to meet Crawley's needs and those of children emanating from the strategic development. This requirement was reflected in an earlier iteration of the Infrastructure Plan, January 2021 (Submission Document Reference: KD/IP/03). The agreed approach to joint working on this matter is set out in the Northern West Sussex Statement of Common Ground, July 2023.
- 10.19.4 In the meantime, all secondary schools in Crawley are now short of capacity and WSSCC (through ongoing discussions with secondary schools in Crawley) is looking at providing 4FE of permanent and temporary expansions to cater for additional places. These 4 further FE of demand for secondary school places is in the short and medium term. WSSCC continues to review and monitor forecasts, including the impact of inward migration and local plan developments on an ongoing basis. The Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) also makes allowance in Policy IN2 for consideration of education provision on sites allocated for uses including housing, where there is a demonstrated need which cannot be met on another site.

10.19.5 Additional background commentary is provided in Topic Paper 1: Unmet Needs and Duty to Cooperate, July 2023, paragraphs 3.3.1-3.3.6 on page 15 (Submission Document Reference: DS/TP/01).

10.19.6 In respect of this issue, CBC proposes two further modifications to the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) in response to further representations from West Sussex County Council, as follows:

- i. Firstly, in the Reasoned Justification of Policy IN2: 'The Location and Provision of New Infrastructure' para. 8.14 is amended as follows (green text indicating a modification already included in the Schedule of Suggested Modifications – this is a correction of an earlier modification):

"The Infrastructure Plan recognises that there is an estimated need for around ~~4-66~~ 84 additional forms of entry at secondary school level in Crawley during the course of the Plan..."

- ii. Secondly, in the Glossary at page 260, a new definition is added as follows:

[Education facilities – Facilities catering to any/all educational needs including Further and Higher, Secondary, Primary, Early Years, and Special Educational Needs and Disability](#)

10.19.7 These proposed modifications are set out in the Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e).

10.20 Question 10.20: What is the situation with Special Education Needs (SEN) over the plan period? The Infrastructure Plan refers to a combination of provision, including a new special school. Are there reasonable options within the Borough to accommodate this need or is this another matter that may need to be addressed through potential sites close to Crawley?

10.20.1 The Infrastructure Plan July 2023, pages 22-24 (Submission Document Reference: KD/IP/01) identifies a need for specialist provision for children with Special Educational Needs. Places to meet needs arising across the wider area (including, but not limited to Crawley) will be provided through a combination of a new special school, Special Support Centres at mainstream schools, and an alternative provision college site for children who are excluded from mainstream education. There is a particular shortfall in provision for children with Social, Emotional and Mental Health needs (SEMH) and for children with Autism. The precise level of need generated by new development over the Local Plan period, and any excess need over and above that met by the interventions identified above, will depend on the mix and tenure of the dwellings delivered. West Sussex County Council (WSCC) will continue to assess predicted pupil numbers and discussions will continue with WSCC over the provision of additional primary and secondary places in the borough.

10.20.2 There are no strategic sites within the Crawley local plan to justify allocation of a SEND facility, however, the Northern West Sussex Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/01) states that the authorities

will work together to secure necessary infrastructure to support growth across West Sussex.

- 10.20.3 Policy IN2 ‘The Location and Provision of New Infrastructure’ of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) also supports the provision of education facilities alongside housing within sites allocated for uses including housing.
- 10.21 Question 10.21: Is the Infrastructure Plan sufficiently clear on highway mitigation in terms of the projects required over the plan period to ensure the potential impacts on the road network arising from the plan’s policies and proposals can be addressed? Is there clarity in respect of identified highways projects as to who will lead on their delivery, what they will cost and potential sources of funding?
- 10.21.1 Crawley Borough Council (CBC) considers that the preparation and submission and updating of the Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/07), and subsequent steps to update this in response to further feedback in the updated Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08) provide sufficient clarity on highways mitigation, lead organisations, costs, potential funding sources and delivery.
- 10.21.2 In addition to this, CBC intends to work with West Sussex County Council (WSCC) and National Highways as part of a Transport Infrastructure Monitoring Group to provide robust ongoing monitoring of delivery of transport infrastructure and development, against the baseline projections set out in the Infrastructure Delivery Schedule. Modifications to policies IN1 ‘Infrastructure Provision’, IN2 ‘The Location and Provision of New Infrastructure’ and Policy ST1: ‘Development and Requirements for Sustainable Transport’ of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01), as well as to the Crawley Submission Sustainability Appraisal (Submission Document KD/SA/01) and Crawley Local Plan Monitoring and Implementation Framework (KD/MIF/01), are proposed in order to reflect this ‘monitor and manage’ approach. This is set out in answer to Question 10.2.
- 10.21.3 Further information about the Infrastructure Delivery Schedule and the ‘monitor and manage’ proposals is provided in answer to Question 10.2.
- 10.22 Question 10.22: Will highway mitigation schemes essential to the Local Plan be implemented in a timeframe that aligns with the submitted development trajectories? How far does the Crawley Area Transport Package go in terms of funding transport improvements that would support the Plan’s strategy and proposals?
- 10.22.1 Projected timings for the implementation of highways schemes which are critical to the Local Plan strategy are set out in the updated Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08), and in particular the Combined Development and Infrastructure Trajectory within this. These have been shared with West Sussex County Council and National Highways.

- 10.22.2 It is anticipated that in particular the schemes at Hazelwick Roundabout and Tushmore Roundabout, as highways schemes which predate the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) and form part of the 'reference case' or 'baseline' of the Crawley Transport Modelling Study June 2022 (Submission Document Reference: ES/ST/01a), will attract funding as part of the Crawley Area Transport Package. These are identified as short-term priorities in the West Sussex Transport Plan 2022-2036, 2022, page 71 (Post-Submission Document Reference: PS/ES/ST/04).
- 10.22.3 Other additional 'critical' highways schemes proposed for mitigation of Local Plan growth (the Ifield Avenue/Crawley Avenue roundabout scheme and the M23 J10 and J10 slipway schemes) may be more dependent on developer contributions, including S106 contributions and Community Infrastructure Levy receipts.
- 10.22.4 The major Forge Wood-related highway schemes at Junction 10 of the M23 and the Crawley Avenue/Balcombe Rd link are committed, as set in the answer to Question 10.16. Other schemes, in particular the other Forge Wood-related highways schemes, will be developer-led and delivered in accordance with planning conditions.
- 10.23 [Question 10.23: How will the highway works to Ifield Roundabout and M23 Junctions 10 and 11 slip roads as identified in the Transport Study be funded? Is there a timeframe for their delivery? Is there any initial, in-principle understanding, proportionate to plan-making, that these interventions would be deliverable? When are they needed within the plan period?](#)
- 10.23.1 Further detail in respect of the funding and timing of these improvements is set out in the Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/07) and in the proposed updated Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08).
- 10.23.2 Broadly speaking these schemes are expected to depend to a large extent on developer contributions. This is expected to include some contribution in the form of S106 financial obligations where the CIL Regulation 122 tests are met, such as in the case of the Gatwick Green Strategic Employment Location and its link to the need for the Ifield Avenue/Crawley Avenue roundabout scheme, as set out in the Crawley Transport Modelling Study, June 2022, paragraphs 7.6.1-7.7.3 on pages 84-89 (Submission Document Reference: ES/ST/01a), and its proportionate impact on the M23 junctions. It is anticipated that a significant proportion of the funding will be in the form of Community Infrastructure Levy receipts, bearing in mind Crawley Borough Council's status as a CIL Charging Authority which ceased levying tariff-style S106 contributions towards highways mitigation upon the adoption of CIL. It is projected that the amount of CIL available to spend on strategic infrastructure (i.e., excluding the 15% neighbourhood portion) over the course of the Local Plan period will be approximately £16.9 million (at 2023 values) as identified in the Introduction to the Crawley Infrastructure Delivery Schedule.
- 10.23.3 The above schemes are identified in the Crawley Infrastructure Delivery Schedule as 'critical', meaning that they would be prioritised for CIL funding under the council's existing CIL Governance process (Post-Submission Document References:

CBC/KD/CIL/01 and CBC/KD/CIL/02). This package is endorsed from a Strategic Road Network perspective by the Crawley Borough Council and National Highways Statement of Common Ground, July 2023, pages 4-5 (Submission Document Reference: SoCG/15a) and from a county highways perspective in the Crawley Borough Council and West Sussex Statement of Common Ground, August 2023, page 5 (Submission Document Reference: SoCG/16).

10.23.4 Projected timings for these schemes are set out in the Combined Development and Infrastructure Trajectory within the updated Infrastructure Delivery Schedule. Broadly speaking they are projected to come forward in the middle and later part of the Local Plan period, consistently with the principle of delivering sustainable interventions ‘up front’ in order to reduce the need for highways mitigation, as well as the anticipated build-out of the Gatwick Green Strategic Employment Location over the period over the period 2027-36. The indicative projected timings are as follows:

Scheme	Projected Timings
Ifield Avenue / Crawley Avenue	2030-35
M23 Junction 11 Northbound Diverge and Merge	2030-35
M23 Junction 10 Southbound Merge	2035-40

10.23.5 Crawley Borough Council (CBC) proposes that the relative sequencing of transport infrastructure and Local Plan growth will be monitored in cooperation with West Sussex County Council and National Highways, and the Infrastructure Delivery Schedule updated accordingly, as part of the ‘monitor and manage’ approach, which is further discussed in answer to Question 10.2.

10.24 [Question 10.24: Is there a programme of works, including schemes identified in the Local Cycling and Walking Infrastructure Plan \(LCWIP\) to secure early progression of sustainable measures for modal shift which if implemented would significantly reduce the need for physical changes to the highway network?](#)

10.24.1 The proposed updated Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08) includes a number of sustainable transport schemes (bus priority/flow/interchange and active travel). A number of these schemes have been identified in the Schedule as ‘essential’, defined as *‘Infrastructure which is required in order to mitigate the development identified in the Local Plan, but where there is greater flexibility regarding the scope or timing of the project, or where there is potential for the projects to be substituted by alternatives.’* These have been chosen on the basis of their achievability and ability to contribute to modal shift, with other sustainable transport schemes identified as ‘desirable’, i.e. *‘Infrastructure projects that are not required as part of the Local Plan mitigation strategy (unless substituted in place of relevant ‘essential’ projects) but which would contribute to additional regeneration/place-making/environmental objectives, and maintain the functionality of existing facilities for the longer-term, in support of the Local Plan vision.’*

10.24.2 A summary of the ‘essential’ sustainable transport projects, including a combination of bus/interchange and Local Cycling and Walking (LCWIP) schemes, is set out in the table provided in answer to Question 10.5.6. Among these the Three Bridges Station

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Improvements and Western Boulevard Sustainable Transport Improvements are planned for implementation in the short term and are already well advanced as planning proposals as follows:

Planning Reference	Site	Development Description	Planning Status
CR/2022/0783/FUL	STATION FORECOURT, THREE BRIDGES STATION, HASLETT AVENUE EAST, THREE BRIDGES, CRAWLEY	IMPROVEMENT WORKS TO RAILWAY STATION FORECOURT, INCLUDING RATIONALISATION OF BUS FACILITIES WITH AREA FOR BUS HUB, CAR,CYCLE AND MOTORCYCLE PARKING, TAXI RANK, AND DROP OFF/PICK UP AREAS; HIGHWAY ALTERATIONS; AND THE PROVISION OF PUBLIC (PEDESTRIAN/CYCLE) ACCESS TO EASTERN SIDE OF STATION FROM STATION HILL INCLUDING CYCLE PARKING, TICKET MACHINE AND ENTRANCE BUILDING AND REVISED DEPOT AND SIGNAL STAFF PARKING	Committee resolution to grant permission subject to S106 (07/03/2023)
CR/2022/0256/RG3	WESTERN END OF THE BOULEVARD, NORTHGATE, CRAWLEY	ROAD AND ACCESS IMPROVEMENT WORKS TO ENCOURAGE SUSTAINABLE MEANS OF TRANSPORT FROM THE END OF THE EASTERN BOULEVARD SCHEME TO THE JUNCTION OF THE HIGH STREET.	Planning Permission (05/10/2022)

10.25 Question 10.25: In light of the statements of common ground with National Highways and West Sussex County Council, will the Infrastructure Plan be updated during the course of this examination?

10.25.1 The proposed updated Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/08), as a further revision of the Crawley Infrastructure Delivery Schedule, October 2023 (Post-Submission Document Reference: CBC/KD/IP/07) represents the response of Crawley Borough Council (CBC) to the matters set out in the National Highways Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/15a), and the Crawley Borough Council and West Sussex Statement of Common Ground, August 2023 (Post Submission Document Reference: SoCG/16), in respect of updates to the Infrastructure Plan. Key elements of the updated document have been shared with

National Highways and West Sussex County Council during its preparation and it is hoped that their satisfaction with document can be confirmed in the near future, through updates to the Statements of Common Ground or otherwise.

10.26 Question 10.26: Is Policy IN2 a sound approach to securing infrastructure delivery through contributions from development where mitigation is required?

10.26.1 Policy IN2: ‘The Location and Provision of New Infrastructure’ of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) is chiefly concerned with the approach the council will take in considering proposals for new infrastructure/facilities, including their potential impact on existing infrastructure/facilities.

10.26.2 Policy IN1: ‘Infrastructure Provision’ is the overarching Policy in respect of securing infrastructure delivery. The policy places a significant emphasis on financial contributions (both in terms of Community infrastructure Levy (CIL) and S106 financial obligations). This emphasis reflects the fact that, as a CIL charging authority, Crawley Borough Council (CBC) seeks to address cumulative impacts of development on, for example, transport and education infrastructure through CIL. It is also a reflection of the nature of the developments which come forward in Crawley, which are typically of a small-to-medium size, as shown by the Housing Trajectory, Base Date 31 March 2023 (Submission Document Reference: H/HD/01) and are frequently in a situation of having to make payment towards offsite infrastructure, such as open space, rather than being able to provide onsite. Seeking payments in this way, however, requires a robust basis in terms of policy and evidence in order to demonstrate satisfaction of the CIL Regulation 122 tests and Planning Practice Guidance in respect of planning obligations. For these reasons, the role of financial contributions is emphasised both in Policy IN1 and in the Planning Obligations Annex to the Plan.

10.26.3 At the same time the Policy does not, and is not intended to, preclude on-site or in-kind provision where this is possible or necessary. As the policy sets out, the delivery and maintenance of necessary infrastructure both on and off the site *‘includes the provision of mitigation to avoid any substantial cumulative effects on the existing infrastructure services.’* This combined approach is summarised more explicitly within paragraph 8.9 on page 99 of the Submission Crawley Borough Local Plan:

‘The council will charge developers the Community Infrastructure Levy (CIL) on appropriate development, in accordance with the council’s adopted CIL Charging Schedule and the CIL Regulations (2010) as amended. Developers will also be required to address relevant site-specific issues and direct impacts on infrastructure and, subject to the relevant tests set out in CIL Regulation 122, these will be addressed through Section 106 agreements requiring on-site delivery and/or a financial contribution towards off-site provision.’

10.27 Question 10.27: Is the Planning Obligations Annex a justified approach and consistent with national policy, including by reference to PPG paragraph 23b-004-20190901?

10.27.1 Crawley Borough Council (CBC) would maintain that the approach represented by the Planning Obligations Annex to the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) is fully consistent with national policy in respect of developer contributions, including PPG paragraph 23b-004-20190901, as well as with the legal tests set out in CIL Regulation 122.

10.27.2 The Annex serves to provide a clear basis for Crawley Borough Council's approach to the use of planning obligations. It is included as part of the Local Plan so that the associated requirements and costs bearing on development can be considered as part of the examination of the Plan, and taken account of from the perspective of development viability.

10.27.3 The Annex is characterised by a significant (though not exclusive) emphasis on quantitative standards and associated financial contributions, which is reflective of the important role played by payments towards offsite mitigation in Crawley, and the need to provide appropriate justification for these, as set out in answer to Question 10.26. Previously Crawley Borough Council has set these out in Supplementary Planning Documents. PPG paragraph 23b-004-20190901 is now, however, clear that:

'It is not appropriate for plan-makers to set out new formulaic approaches to planning obligations in supplementary planning documents or supporting evidence base documents, as these would not be subject to examination.'

10.27.4 As such it has been necessary for CBC to set out the 'formulaic' aspects of its approach to developer contributions within an annex to the Plan.

10.27.5 This approach does not, and is not intended, to override the operation of the Regulation 122 tests, and in particular the requirement that the obligation must be 'directly related to the development'. Crawley Borough Council's typical practice with regard to tariff-style S106 infrastructure contributions is to satisfy this requirement by identifying a specific project related to the development that can be identified in the obligation as the recipient. This approach is consistent with that set out in the Department for Education Guidance on Securing developer contributions for Education, August 2023 (Post-Submission Document Reference: PS/WC/IN), which recommends the use of a Pupil Yield Calculator to set the level of contributions, while proposing that planning obligations identify specific recipient projects in order to satisfy the S106 tests.

10.27.6 A number of specific amendments to the Annex are proposed in Crawley Borough Council's Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e). However, these do not alter the principles of the overall approach.

- 10.28 Question 10.28: PPG also states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003- 20190901), implying that there should be flexibility in how that is achieved, such as through planning obligations or contributions under CIL. Would it be necessary for plan soundness to add some flexibility in the Annex?
- 10.28.1 Crawley Borough Council (CBC) recognises that there is a balance to be struck between flexibility in the application of developer contribution requirements on the one hand and clarity and predictability on the other. CBC considers that the approach taken by Annex is sound and reasonable in this regard. As stated in Policy IN1: 'Infrastructure Provision' of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01), the Planning Obligations Annex 'sets out the anticipated planning obligations associated with the Policies established by this Local Plan.' It does not claim to cover all possible circumstances in which a need for a Planning Obligation might arise, but seeks as far as possible to provide clarity regarding those which can reasonably be predicted on the basis of the Local Plan policies.
- 10.28.2 CBC would characterise the approach taken by the Annex as representing a combination of 'tariff style' requirements with additional content, reflecting and building on the content of the Local Plan policies, which seeks to set out as clearly as is reasonably possible what other non-financial obligations can be anticipated. The relative emphasis on 'tariff style' approaches reflects the characteristics of development typically experienced in Crawley, as set out in answer to question 10.26. By contrast, Policy EC4: 'Strategic Employment Location' takes a different approach in relation to the Local Plan's only strategic development, by disapplying the sustainable transport contribution set out in Policy ST1: 'Development and Requirements for Sustainable Transport', in recognition of the need to provide significant infrastructure in kind as part of the development. Proportionate contributions towards necessary local and strategic highway improvements would also be sought through s106 for this strategic site.
- 10.28.3 The collection of CIL from developments is subject to Crawley Borough Council's CIL Charging Schedule, adopted in 2016. Having been set, following examination, on the basis of what development can viably support, the Charging Schedule operates independently of the Local Plan in accordance with the legal framework set by the CIL Regulations. There is at present no intention to review the Charging Schedule and the Crawley Local Plan & Community Infrastructure Levy Viability Assessment March 2021 (Submission Document Reference: DS/VA/02a) for the Submission Crawley Borough Local Plan has been undertaken on the basis of the current CIL Charges remaining in place.

Issue 4: Plan-wide Viability.

- 10.29 Question 10.29: Taking account of the evidence in the Plan Viability Assessment 2021 and the 2022 Update (documents DS.VA.02a and 01a), would the requirements of the policies of the Plan put the viability of its implementation at serious risk?
- 10.29.1 Crawley Borough Council (CBC) believes that the Crawley Local Plan & Community Infrastructure Levy Viability Assessment March 2021 (Submission Document Reference: DS/VA/02a) and the Crawley Local Plan Review Viability Assessment Update December 2022 (Submission Document Reference: DS/VA/01a), with their Appendices (Submission Document Reference: DS/VA/02b and DS/VA/01b), represent a proportionate assessment of the impact of the policies and requirements in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) on the development proposed in the Plan. This work has been undertaken in accordance with paragraph 58 of the National Planning Policy Framework 2021 (Post-Submission Document Reference: PS/DS/NPPF/01) and Planning Practice Guidance.
- 10.29.2 CBC further maintains that these Viability Assessment documents provide a level of assurance proportionate to plan-making that the policy requirements in the Plan would not represent a serious risk to the viability of the development proposed in the Plan.
- 10.29.3 The 2021 Viability Assessment tests the viability of the proposals which were set out in Draft Crawley Borough Local Plan January 2021 – 2037 (Submission Document Reference: CBLP/04) in relation to a range of residential and non-residential typologies and proposed site allocations relevant to the Local Plan strategy.
- 10.29.4 The 2022 update was undertaken to take account of the following factors, which did not feature in the earlier assessment:
- The cost of water neutrality requirements set out in Policy SDC4: ‘Water Neutrality’ of the Crawley Borough Submission Local Plan, May 2023;
 - Costs of electric vehicle charging infrastructure;
 - The requirements in respect of First Homes incorporated into Policy H5: ‘Affordable Housing’ of the Crawley Borough Submission Local Plan, May 2023, in accordance with national policy;
 - Recent evidence in respect of build costs and development values.
- 10.29.5 The update was run on three representative typologies selected from the wider range of typologies which featured in the 2021 Assessment.
- 10.29.6 CBC considers the content of the Crawley Local Plan & Community Infrastructure Levy Viability Assessment March 2021 and the Crawley Local Plan Review Viability Assessment Update December 2022, with their Appendices, demonstrates the overall soundness of the Assessment itself and the Local Plan approach.
- 10.29.7 It is important to emphasise that, as set out in chapter 2 of the 2021 study, the proposed policy approach is the product of an iterative process in which initial tests informed revisions to the policy approach, particularly with regards to Crawley

Borough Submission Local Plan Policy H5: 'Affordable Housing' and the Planning Obligations Annex.

- 10.30 Question 10.30: Has the Plan Viability Assessment been subject to consultation / stakeholder engagement to 'sense check' the assumptions and approach used?
- 10.30.1 As set out in the Crawley Local Plan & Community Infrastructure Levy Viability Assessment March 2021, paragraphs 2.31 to 2.33 (Submission Document Reference: DS/VA/02a) the preparation of the Assessment included a period of stakeholder engagement in which questionnaires were sent out to a range of parties based on consultant advice and the council's own contacts lists. The questionnaires set out a range of assumptions proposed to be used as inputs to the study relating to a wide range of variables including development and land values, professional fee levels, financing costs, site works costs, contingency, developer's profit, promotion/ marketing costs and legal costs.
- 10.30.2 The March 2021 Assessment and Appendices were subject to public consultation as part of the 2021 and 2023 Regulation 19 consultations on the Plan, with the latter consultation also including the Crawley Local Plan Review Viability Assessment Update December 2022 (Submission Document Reference: DS/VA/01a) and Appendix (Submission Document Reference: DS/VA/01b).
- 10.31 Question 10.31: Does the evidence in the viability assessment show that, in line with NPPF paragraph 57, the policies in the Plan are viable taking account of affordable housing contributions, the current CIL as indexed (and its potential for future review) and likely site-specific planning obligations and so significantly reducing the need for costly and potentially protracted individual development appraisals at the planning application stage?
- 10.31.1 The Crawley Local Plan & Community Infrastructure Levy Viability Assessment March 2021 (Submission Document Reference: DS/VA/02a) and the Crawley Local Plan Review Viability Assessment Update December 2022 (Submission Document Reference: DS/VA/01a), with their Appendices (Submission Document Reference: DS/VA/02b and DS/VA/01b) take account of the policies and requirements in the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01), including planning obligations and affordable housing requirements as well as the Crawley Borough Council's adopted (and indexed) CIL Charging Schedule (Post-Submission Document Reference: CBC/KD/CIL/01) .
- 10.31.2 The Assessment is based on the residual valuation method, applied alongside an approach to land values which is based on the Planning Practice Guidance-compliant 'EUV+' model, i.e. existing use value combined with a premium for the landowner. The assessment of development costs has been undertaken on a robust basis, informed by the 2019 updates to the Planning Practice Guidance on Development Viability, with the intention that the need for individual development appraisals at the application stage can be minimised. As such the process has include detailed policy-by-policy review and clear assumptions across a wide range of variables, as set out in Appendix I of the 2021 assessment (Submission Document Reference: DS/VA/02b). The assessment is conducted on the basis that the existing

CIL Charging Schedule will remain in place, and there are indeed no current proposals to review the Charging Schedule.

10.31.3 The iterative process by which the Local Plan Policies and Viability Assessment have been prepared, noted in answer to Question 10.29, and notably including the revision to affordable housing requirements discussed in answer to Question 10.32, is reflective of the intention to refine the policy mix in light of evidence of what the kinds of development proposed in the Local Plan are likely to be able to support.

10.31.4 In addition, Crawley Borough Council is proposing a further series of modifications to Policy H5: 'Affordable Housing' (and consequentially to the Planning Obligations Annex) in respect of developments including an element of care, (Schedule of Suggested Modifications, version 5, 15 December 2023 (Examination Document Reference: CBC/CBLP/07e). These changes are intended to further ease viability pressures on developments of this kind and are set out more fully in the council's responses to the questions posed under Matter 6.

10.31.5 Notwithstanding the above, the council's consultants advise on the basis of their experience since the 2019 updates to the Planning Practice Guidance that there is still likely to be some role for viability appraisals at the individual development level, albeit that the onus is clearly on the developer to justify any significant departure in assumptions from those which inform the plan-level viability assessment. Flexibility for this, and the circumstances when it may be possible, are set out in Policy H5.

10.32 [Question 10.32: Does the viability evidence justify the significant affordable housing policy differential in Policy H5 between the town centre and the rest of the Borough?](#)

10.32.1 The findings of the testing undertaken in the preparation of the Crawley Local Plan & Community Infrastructure Levy Viability Assessment March 2021 (Submission Document Reference: DS/VA/02a) are the primary reason for proposing the differential within Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) Policy H5: 'Affordable Housing' between the boroughwide headline requirement of 40 per cent of units, and the town centre requirement of 25 per cent of units. This differential did not feature in Crawley 2035: Draft Crawley Borough Local Plan, January 2020 (Submission Document Reference: CBLP/05) which was subject to Regulation 19 consultation in early 2020, but had appeared by the time of Draft Crawley Borough Local Plan January 2021 – 2037 (Submission Document Reference: CBLP/04), which was published for Regulation consultation in early 2021, and took account of the emerging findings of the 2021 Viability Assessment.

10.32.2 A particular finding of the 2021 Viability Assessment is that town centre residential and mixed-use schemes are affected by a combination of factors tending to constrain viability, including in particular:

- Higher existing use values for land;
- Higher build costs, including the need for additional structural reinforcement and building services in taller buildings;

- Assumed additional professional fees costs related to the design requirements of building at higher densities.

10.32.3 The constraining effect of these variables on residential development viability in the context of projected development values was apparent throughout the various stages of testing that were undertaken for the 2021 assessment. They were reflected in particularly challenging results for one of the key typologies tested: a 6+ storey flatted scheme of 100 units, as reflected particularly in Appendices IIa, IIc and II d (Submission Document Reference: DS/VA/02b). These findings and subsequent consultant recommendations are summarised in paragraphs 3.2.1 to 3.5.6 on pages 63-70 of the 2021 Assessment.

10.32.4 There is a very significant need for affordable housing, demonstrated in the Strategic Housing Market Assessment, 2019 (Submission Document Reference: H/HN/01) within the borough, and its delivery is a longstanding corporate priority of Crawley Borough Council. The step of reducing the requirement would not have been taken without very compelling necessity.

10.33 [Question 10.33: Does the viability assessment align with the evidence in the Water Neutrality Study on the likely cost of mitigation including the details of the required offsetting scheme?](#)

10.33.1 The Crawley Local Plan Review Viability Assessment Update December 2022 (Submission Document Reference: DS/VA/01a) makes allowance for a cost of £2,000 per dwelling to cover the costs of achieving water neutrality in accordance with Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) Policy SDC4: 'Water Neutrality'. The allowance is intended to cover the costs of on-site water efficiency measures (based on an expectation of how these will average out across the dwelling mix) as well as the costs of offsetting.

10.33.2 This figure is informed by the findings of Water Neutrality Part C – Strategy (Submission Document Reference: ES/SDC/05). Section 4.3.2 of the document, including paras. 90-103 on pages 20-22, sets out a range of technical solutions and associated costs for on-site water efficiency measures. These include a 'fittings only approach' with costs ranges of £349-431 and £1,049-1,531 per dwelling (dependant on whether the cost of providing a dishwasher and washing machine is treated as an additional cost to the developer) and the option of greywater recycling with a cost of £4,000-£4,340 per dwelling.

10.33.3 Separate figures on indicative costs of offsetting measures (and taking account of the projected contribution of Southern Water's Water Resource Management Plan measures) are set out in section 6.6 of the Water Neutrality Part C report, including paragraphs 205-215. A calculation is provided pointing to an indicative cost of £86 per dwelling and this is substantially reflected in a similar calculation in the Planning Obligations Annex to the Crawley Borough Submission Local Plan, May 2023, pages 291-292 (Submission Document Reference: CBLP/01). It is anticipated that the costs of the offsetting scheme for developers will include some additional expense over and above that of the offsetting measures themselves to reflect the administrative overheads of the scheme.

10.33.4 The Joint Water Neutrality Topic Paper May 2023, paragraph 4.6, pages 19-20 (Submission Document Reference: DS/TP/00a) confirms that the viability inputs used to account for the cost of water neutrality have been agreed among the Local Authorities who have cooperated in the development of the Policy.