



Homes
England

Crawley Local Plan 2024 -2040 Examination in Public

Matter 6: Gypsies, Travellers and Travelling
Showpeople

Hearing Statement

Date: December 2023



Issue 3: Gypsies, Travellers and Travelling Showpeople - Accommodation Assessment Update 2023 (the GTAA)

1. Introduction

- 1.1 This statement has been prepared by Homes England in its capacity as landowner and promoter of West of Ifield, Horsham, identified as a strategic site in the emerging Horsham Local Plan review.
- 1.2 This statement supplements Homes England's previous representations to the Crawley Borough Council Local Plan Regulation 19 consultation (dated 16 June 2023). Where relevant separate submissions will be made in relation to Homes England's other land interests.

2. **Is the submitted Plan Policy H8 justified at criterion a) in terms of the differentials in noise thresholds for permanent and transit provision and have alternative thresholds been considered? Is the Policy clear on how proposals within the safeguarded land should be assessed?**

- 2.1 As per our previous representations, whilst Homes England is supportive of the ambitions and intention of draft Policy H8 as a whole, for Policy H8 to be positively prepared and justified a more flexible approach to the assessment of noise impacts should be considered whereby this type of development can be accommodated and found acceptable beyond the 57dB contour where appropriate mitigation is applied and when considering sites on a case-by-case basis.
- 2.2 Consistent with our response concerning Policy EP4 in Matter 9, the Unacceptable Adverse Effect Level (UAEL) at a lower limit of 57dB does not appear to be sufficiently justified as the sound levels adopted by Crawley Borough Council within the Noise Annex are significantly lower than those in mainstream use for aviation noise and are out of step with national guidance. Furthermore, as currently drafted the policy is not effective as could limit the delivery of much needed Gypsy, Traveller and Travelling Showpeople Sites in the authority area / wider housing market area.
- 2.3 As detailed in our representations, it is evident in the examples provided by Homes England of recent appeal and committee decisions as set out in Appendix 1, that this

type of acceptable living conditions can be achieved within Gypsy and Traveller homes beyond the 57dB contour, through various mechanisms and mitigation.

- 2.4 As set out in our previous representations, Homes England recommended additional assessment criteria to make Policy H8 sound, positively prepared and justified. Recognising the sensitivity of the community and their requirements compared to other occupiers, the proposed additional criteria would seek to introduce a sequential approach ensuring every attempt has been made to identify areas outside of the 57dB first, and only allowing development within it if no alternative sites are available and adequate mitigation can be demonstrated.

Appendix 1: Examples of permitted Gypsy and Traveller accommodation in proximity to airports

Local Precedent Examples

Below is a table detailing local precedent examples of Gypsy and Traveller sites which have been permitted within locations that are exposed to aircraft noise.

Scheme	Local Planning Authority	Application Reference	Status/ Decision Date	Net Pitches/ Description of Development	Comments
Land at Russ Hill, Charlwood, Horley, Surrey, RH6 0EL	Mole Valley	MO/2019/0741	Permitted 10/8/2020	Change of use of land to mixed use. Stationing of 2 No. static caravans and two touring caravans, construction of hardstanding, parking for four vehicles, associated infrastructure and the keeping of horses.	Extract from Committee Report: “The plan below shows the noise contours arising from the aircraft movements at Gatwick Airport. The site is exposed to average day time noise levels between 57dBA and 60dBA and average night time noise levels between 51dBA and 54dBA. Gatwick Airport Limited take the view that the levels of noise, both during the day and at night would still be at levels that would be regarded as significant. Current national noise policy as set out in the NPPF and expanded upon further in the Noise Policy Statement for England (2010) is to ‘avoid noise giving rise to significant adverse impacts on health and the quality of life’ (NPPF paragraph 180). The government’s Planning Practice Guidance advises that significant adverse effects should be avoided through, for example, the choice of sites at the plan-making stage, or by the use of appropriate mitigation such as altering the design and layout. As covered in paragraph 7.40 above, noise was an issue for consideration in the appeal at Riverdale Paddocks in Rusper Road Capel. The Inspector commented on this issue as follows:- “The site is crossed by the 57dBA noise contour around Gatwick Airport, and the caravans are now sited within that

					<p><i>contour. Therefore, Gatwick Airport Limited has objected to the development in its current arrangement on the grounds that residents would experience unacceptable noise. However, it has nonetheless suggested it would be acceptable to relocate the caravans to the southern side of the site where they would be outside the contour.</i></p> <p><i>Based on what I heard on my visit, there is no appreciable noise difference between the northern and southern sides of this relatively small site. Therefore, I consider that the noise experienced in the caravans in their current positions is not unacceptable."</i></p> <p>Taking into account this recent decision (June 2016) and the similarity in circumstances between that site and the current proposal, it is considered that refusal based on noise exposure to the occupiers would not be justifiable."</p>
Riverdale Farm, Rusper Road, Capel, Surrey	Mole Valley	MO/2015/0768 APP/C3620/W/ 15/3137675	Refused. Allowed on Appeal 21 June 2016	Retrospective change of use of land for stationing of caravans for residential occupation with associated development comprising new access, hard standing, landscaping and fencing between plots, timber utility sheds and package treatment plant for 2 No. gypsy-traveller plots.	<p>Extract from Appeal Decision:</p> <p>"The site is crossed by the 57dBA noise contour around Gatwick Airport, and the caravans are now sited within that contour. Therefore, Gatwick Airport Limited has objected to the development in its current arrangement on the grounds that residents would experience unacceptable noise. However, it has nonetheless suggested it would be acceptable to relocate the caravans to the southern side of the site where they would be outside the contour. Based on what I heard on my visit, there is no appreciable noise difference between the northern and southern sides of this relatively small site. Therefore, I consider that the noise experienced in the caravans in their current positions is not unacceptable".</p>

Wider Precedent Examples

Below is a table detailing wider precedent examples of Gypsy and Traveller sites from across the county which have been permitted in locations that are exposed to aircraft noise.

Scheme	Local Planning Authority	Application Reference	Status/ Decision Date	Net Pitches/ Description of Development	Comments
Land West of Skelton's Drove Beck Row Suffolk	West Suffolk Council	DC/22/0648/FUL	Permitted 24/3/2023	Change of use of the land for provision of 18 pitches for Gypsy/ Traveller residential use; b. 18 dayroom buildings, with hardstanding for the siting of one static and one touring caravan on each pitch; c. vehicular access and associated parking; d. hard and soft landscaping scheme	<p>Extract from Delegated Report: The site falls within the 72dB MOD noise contour with reference to aircraft noise. The main noise source the site is exposed to is flight noise from the nearby RAF Mildenhall. The application is supported by an Acoustic Report including a noise risk assessment and Acoustic Design Statement. A noise survey was undertaken over an 8 day period which established that the highest measured daytime level was 62dB $L_{Aeq,16h}$ and the highest night time was 51dB $L_{Aeq,8hr}$. The night time L_{Amax} was taken as 66dB, all to the nearest decibel. At the façade of the proposed units a +3dB correction is applied. The initial site noise risk assessment was assessed as low to medium, according to Figure 1 of ProPG Planning and Noise. To achieve ProPG Noise level Guidelines mechanical ventilation. The reports advises that 'the static caravans would need to provide an overall sound insulation of at least 30dB. This can be achieved by ensuring that the caravans installed meet the specifications of BS3632:2015 'Specifications for Residential Park Homes and Residential Lodges'. This standard was revised in 2015 to take into account changes in technology and improve energy efficiency performance. As these types of accommodation do not</p>

					<p>typically come under Building Regulations, the revision allows manufacturers to produce homes that are fit for purpose and comfortable all year round.</p> <p>According to the BS, the internal to external sound reduction should meet 35dB, exceeding the requirement of a 30dB reduction. The report therefore suggests that a condition is attached to any planning consent to ensure that the static caravans on site shall meet the specifications of BS3632:2015. It is acknowledged that the exposure of external amenity areas would exceed the recommendations, but due to the overhead nature of the noise source, further attenuation measures are not practicable. This will weigh modestly against the proposal in the planning balance.”</p>
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