

Crawley

Local Plan

Crawley Borough Local Plan Examination

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

Matter 7: Crawley Town Centre

December 2023



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Issue 1: Whether the plan's overall approach to town centre development is sound.

- 7.1 Question 7.1: Is the plan's evidence for setting an impact threshold of 500 square metres, departing from the NPPF's (paragraph 90) default threshold of 2,500 square metres sufficiently robust?
- 7.1.1 Submission Crawley Borough Local Plan, May 2023 (Submission Document Reference: CBLP/01) Policy TC5 (Town Centre First) recognises the important economic and social role of Crawley Town Centre and seeks to retain its position as a healthy and competitive centre. The Policy responds to National Planning Policy Framework (NPPF) 2021 (Post-Submission Document Reference: PS/DS/NPPF/01) requirements to support the role that town centres play at the heart of their communities (NPPF paragraph 86) applying the NPPF paragraph 90 impact test within a local context.
- 7.1.2 NPPF paragraph 90 advises that a proportionate, locally specific impact threshold may be applied. Planning Practice Guidance: Town Centres and Retail, paragraph 015 (ref) sets out that in setting a locally appropriate threshold, regard should be had to considerations including existing town centre viability and vitality, cumulative effects of recent development, and the vulnerability of town centres.
- 7.1.3 The Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment, January 2020 (Submission Document Reference: EGSM/TC/01) was prepared on behalf of Crawley Borough Council (CBC) by consultants Nexus. This Assessment considers what scale of proposal would be likely to impact upon the vitality and viability of Crawley Town Centre. The Assessment finds Crawley Town Centre to have suffered a fall in market share in overall spending at physical shops (both convenience and comparison) over the decade to 2020. It finds Crawley Town Centre and its neighbourhood parades to be vulnerable to competing edge-of-centre and out-of-centre retail development, that is cumulatively 'chipping away' at vitality and viability.
- 7.1.4 In response, it recommends a locally set impact threshold of 500 sqm across the borough, to be applied on a proportionate basis, capable of accounting for larger convenience retailers whilst avoiding placing an undue burden on smaller stores and extensions. The rationale for this recommendation in 2020 was built on an assessment of the PPG factors, most notably 'scale of proposals relative to town centres', 'the existing vitality and viability of the town centre', 'cumulative effects of recent developments' and 'whether local town centres are vulnerable'.
- 7.1.5 The 500sqm local impact threshold has been questioned by a representation to the Local Plan Further Publication Regulation 19 Consultation carried out between May and June 2023. The representation (REP 165 (2023)) is submitted by Quod on behalf of DT Last Mile Retail (Crawley) Unit Trust who own the County Oak retail park, and can be viewed at page 567 of the Consultation Statement Appendix 8 (submission Document Reference: KD/CS/01j).
- 7.1.6 In the light of this, CBC commissioned Nexus to revisit its original work, to objectively consider if its recommended impact threshold remains justified. This work, '*Response to Matters 7.1 and 7.5*', and referred to henceforth as the 2023 Nexus

Update, revisits the PPG paragraph 015 local impact threshold criteria and undertakes an updated Town Centre Health Check (November 2023). It is submitted as Appendix A of this CBC Written Statement in response to the Inspectors' Matter 7 and separately as an examination document (Post-Submission Document Reference: PS/EGSM/TC/02).

7.1.7 Three of the PPG paragraph 015 criteria considered in the 2023 Nexus Update are particularly relevant to the setting of a locally appropriate impact test threshold of 500sqm. These are:

- I. **Scale of proposals relative to Town Centres.** The 2020 Nexus work considered the size of Crawley Town Centre units relative to the size of development proposed as commitments. This found the scale of committed development to be similar to the size of units available in Crawley Town Centre, lending weight to an overall conclusion that a lower impact threshold should be sought. The 2023 Nexus Update finds this position unchanged, with the average scale of commitment and average size of Town Centre unit remaining similar. It goes on to consider the stated (indicative) requirements of national retailers looking for new units in Crawley. The overwhelming majority of these floorspace requirements are less than the national 2,500sqm threshold. Therefore, these could not be considered in impact terms were an application for development outside the Town Centre to come forward. This lends further weight to the adoption of a locally set 500sqm impact threshold.
- II. **Whether local Town Centres are vulnerable.** The 2023 Nexus Update confirms (paragraph 2.22) that Crawley Town Centre has experienced a reduction in convenience (30.4% to 26.5%) and comparison goods (42.6% to 40.5%) market share over the period 2010 to 2019, and therefore remains vulnerable. The updated health check finds the number of vacant units and floorspace to have increased over time, with average rents decreasing and market yield negatively increasing. These key health-check indicators (summarised below) each show a decline, leading Nexus to conclude that based on latest evidence, Crawley Town Centre remains vulnerable to out-of-centre competition.

	% Vacant Units	% Vacant Floorspace	Average Market Rent	Market Yield
2023	12.5	23.1	£30.15/sq.ft	-7.8%
2019	10.8	8.9	£31.50/sq.ft	-6.8%
2010	7.5	4.3	N/A	N/A

Source: Nexus 2023, DTZ 2010.

- III. **Likely effects of development on any Town Centre Strategy.** Since the 2020 Nexus study, CBC has progressed a detailed Town Centre Regeneration Programme (included as an appendix to the 2023 Nexus Update), through which significant funding has been secured for Town Centre improvements. Nexus finds that with funding secured and a detailed delivery programme very recently put in place, it is evident that a cogent Town Centre Strategy could be threatened by undue out-of-centre retail growth detracting from town centre footfall.

- 7.1.8 Having regard to the above, the 2023 Nexus Update concludes that as a result of the likely scale of proposals relative to Crawley Town Centre, the evidenced vulnerability of the Town Centre, and the potential effects of development outside the Town Centre on the Town Centre Strategy, it remains appropriate to seek a local impact threshold of 500sqm for Crawley Town Centre. Having undertaken a reappraisal of its evidence in light of consultation feedback, CBC considers the proposed 500sqm local impact threshold to be robust.
- 7.2 [Question 7.2: Is the extent of the primary and secondary shopping frontages sufficiently defined, with appropriate uses, as part of a positive strategy for the future of the town centre in line with Framework Paragraph 86\(b\)?](#)
- 7.2.1 Crawley Borough Council (CBC) believes that the extent of primary and secondary shopping frontages forms part of a positive strategy for the future of Crawley Town Centre in accordance with national planning policy. As per National Planning Policy Framework (NPPF), 2021, paragraph 86(b) (Post-Submission Document Reference: PS/DS/NPPF/01), Submission Crawley Borough Local Plan, May 2023 (Submission Document Reference: CBLP/01) Policy TC1 defines the extent of the Town Centre and the Primary Shopping Area.
- 7.2.2 The Primary Shopping Area represents Crawley’s retail core, containing the primary and secondary shopping frontages. The Policy identifies the primary shopping frontages as a focus for Use Class E development, recognising the positive role of retail and other uses within this class in generating footfall, activity and vibrancy. The secondary shopping frontages, typically located at the periphery of the Primary Shopping Area, support a wider range of uses, including drinking establishments and hot-food takeaways. Such uses are not necessarily open throughout the day, hence the distinction between the two frontages, with the focus of the primary shopping frontage being to promote vibrancy, and the more flexible secondary frontages supporting a wider range of uses, including those that may open into the evening and night-time. It is important to note that the Policy is not applied prescriptively, and as worded it affords flexibility within both the primary and secondary shopping frontages for other Main Town Centre uses where these would support overall town centre vitality and viability.
- 7.2.3 Policy EC1 (and other submission Local Plan Town Centre Policies) recognise the positive role of residential within the town centre. Within the Primary Shopping Area, use of upper floors for residential and town centre neighbourhood facilities is supported. In doing so, the Policy seeks to strike an appropriate balance between the principal commercial function of Crawley Town Centre and its role as a place to live – this is to ensure that residential uses add to Town Centre vitality and viability, rather than undermining it. Therefore, the Policy requires any loss of employment floorspace to be justified against the Policy EC2 criteria. CBC consider this to be an appropriate approach, as where planning permission is required, it allows for an assessment to be made as to whether the loss of employment space could impact upon town centre vitality and viability - for example, where a proposed loss of upstairs storage could impact upon a related commercial operation in the ground floor unit below.

- 7.2.4 The 2023 Nexus Update, set out in Appendix A to this Written Statement and examination document (Post-Submission Document Reference: PS/EGSM/TC/02) has considered the Policy TC1 approach, with its paragraph 3.12 endorsing the approach taken by the council:

Our judgment, based on the 2023 health-check at Appendix A, is that the Council has indeed struck the right balance. In our response to Matter 7.1, we have classified the Town Centre as potentially 'vulnerable'. A key pillar to that assessment is the level of vacancy, which is 12.5% of all units in the Town Centre and 23.1% of all floorspace. Whilst the Primary Shopping Area should be protected from any dilution of retail uses, there is clearly room for retail uses which exist outside the Primary Shopping Area, but within the Town Centre Boundary, to consolidate within the Primary Shopping Area in the future. This would assist with enabling residential development to support the vitality and viability of the Town Centre through greater footfall. We agree therefore with the proposed hierarchical approach to the protection of retail space.

- 7.2.5 Therefore, CBC considers, as reiterated by the 2023 Nexus Update, that the extent of the primary and secondary shopping frontages is sufficiently defined, with appropriate uses, as part of a positive town centre strategy in line with NPPF paragraph 86(b).

7.3 [Question 7.3: In addition to the town centre key opportunity sites identified in TC3, what provisions are made for any other sites that may come forward during the plan period?](#)

- 7.3.1 The Submission Crawley Borough Local Plan, May 2023 (Submission Document Reference: CBLP/01) recognises Crawley Town Centre as a highly sustainable location for residential and main town centre uses, with access to many facilities and suitable for a mix of land uses. Policy TC1 supports development that enhances the vitality and viability of the Town Centre, and Policy TC2 specifically supports the development of town centre neighbourhood facilities to support the growing residential population.

- 7.3.2 The positive approach to residential development in the Town Centre is reflected in Policy TC3 and Policy H2, which identify a minimum of 1,500 net dwellings to come forward cumulatively across the Town Centre Key Opportunity Sites. These sites are specifically identified for development comprising main town centre uses or mixed-use development that comprises residential use with either main town centre uses and/or town centre neighbourhood facilities. Policy H2 allocates further specific housing sites in the Town Centre, totalling 179 units.

- 7.3.3 As confirmed by the supporting Reasoned Justification to Policy TC3 (Paragraph 11.27) and by Policy H2, the whole Crawley Town Centre is identified as a 'broad location for future housing' in anticipation that other sites may come forward over the Plan period. Policy H2 projects an indicative total of 129 dwellings for this broad location, based on projected capacities of five individual sites identified in the SHLAA and Housing Trajectory. These are suitable sites with a reasonable prospect of contributing to Crawley's housing supply during years 6-10 of the Local Plan period, which serve collectively as a basis for establishing the capacity of the Town Centre Broad Location.

- 7.3.4 Projected residential development in Crawley Town Centre is not limited to these identified sites, and as set out at Crawley Borough Local Plan footnote 15, page 23, a total of 2,087 dwellings (including the Policy TC3 and H2 sites) are anticipated to come forward in the Town Centre over the period 2021-2040.
- 7.3.5 Further additional development is likely to come forward in Crawley Town Centre during the Local Plan period as part of the windfall allowance of 100 dwellings per annum. The Transport Modelling Study, June 2022, paragraph 4.2.1, page 30 (Submission Document Reference: ES/ST/01) included the assumption that 60% of windfalls would be within the Town Centre. This assumption is based on the assessment of likely windfall supply detailed in the Windfall Statement, May 2023 (Submission Document Reference: H/HD/06) which suggests an uplift from the types of sites likely to be found in the town centre, including office to residential conversions, other larger windfall sites and effective use of land.
- 7.3.6 In particular, on the last potential new source of windfall capacity, the Compact Residential Development Study, May 2023, Part 2 (Submission Document Reference: WC/CLD/01) confirms that Crawley Town Centre is able to support high density ranges, with Policy CL4 of the Local Plan requiring a minimum of 200 dwellings per hectare for development sites within a short walking distance of major public transport interchanges and corridors.
- 7.3.7 The submission Local Plan, read as a whole, sets out a framework for the consideration of Town Centre windfall sites, including the following:
- Policy TC1 provides scope for residential use at first floor level within the Primary Shopping Area;
 - Policy TC2: Town Centre Neighbourhood Facilities seeks to ensure the delivery of a significant increase in residential population within Crawley Town Centre is supported by the necessary facilities associated with such development;
 - Policy H3b: Housing Typologies: Densification, Infill Opportunities and Small Sites, Policy H3c: Housing Typologies: Town Centre Residential Sites; Policy H3d: Housing Typologies: Upward Extensions', and Policy H3e: Housing Typologies: Conversions from Commercial/Non-Residential Uses, express 'in principle' support for various development typologies relevant to the Town Centre, while noting key considerations and constraints applicable to them.
 - Policies CL2-CL5 and DD3 set out how development will be expected to exploit potential for effective use of land through embracing opportunities for increased density, as appropriate; through design and/or masterplanning for successful links to sustainable travel networks; and through implementation of standards intended to ensure an acceptable living environment within the context of medium and higher density new development.
- 7.3.8 As such, it is considered that the submission Local Plan makes appropriate provision for other town centre sites to come forward over the Plan period.

- 7.4 Question 7.4: Have all opportunities been taken to ensure that the site capacity of the town centre key opportunity sites (and any other town centre redevelopment) will be maximised?
- 7.4.1 Crawley Borough Council (CBC) have taken all opportunities to ensure site capacity is maximised on all sites, including those in the Town Centre, as set out in Topic Paper 4: Housing Supply, July 2023, paragraphs 3.3.1-3.3.8, pages 13-15 (Submission Document Reference: DS/TP/04). The table in paragraph 3.4.1 of the Housing Supply Topic Paper shows how the reassessment of site potential in light of feasibility work and urban design input since sites were allocated in the adopted Local Plan has increased the indicative site capacities of town centre sites, including an additional 73 dwellings for Longley House; 281 dwellings for Telford Place (now with a resolution to grant permission); 85 dwellings at County Buildings; 408 dwellings at Land North of the Boulevard and 83 dwellings for the Town Centre Broad Location.
- 7.4.2 An important part of the policy framework of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) for making effective use of land is established through Policies CL2 to CL5 and Policy DD3 as well as Policies H3a-f. In particular, submission Local Plan Policies CL2-CL5 and Policy DD3 set out how development will be expected to exploit potential for effective use of land. This includes embracing opportunities for increased density, as appropriate, through design and/or Masterplanning for successful links to sustainable travel networks. Policy CL4 specifically requires a minimum of 200 dwellings per hectare for development sites within 800m of Crawley station and bus station, and/or 640m of the eight Town Centre Fastway stops.
- 7.4.3 CBC considers that the strategy taken regarding optimisation of site capacity is both appropriate in regard to and consistent with national policy on design, and with other key local constraints, such as the proximity of Gatwick Airport which restricts the height of buildings due to radar considerations. This is further set out in the council's Written Statement in response to Matter 3, Issue 1: Question 3.5 paragraph 3.5.5 and Question 3.6, paragraph 3.6.2-3.6.3 and 3.6.5-3.6.6 (Examination Document Reference: CBC/MIQ/003a) as well as the council's Written Statement in response to Matter 8 Issue 1: Question 8.1, paragraphs 8.1.5 - 8.1.6, Question 8.5, paragraph 8.5.4, and Question 8.7 (Examination Document Reference: CBC/MIQ/008a).
- 7.5 Question 7.5: Does the plan sufficiently cater for a 'town centre first' approach, having regard to opportunities for permitted development changes of use both within and outside the town centre?
- 7.5.1 Crawley Borough Council (CBC) considers that the Plan sufficiently caters for a 'town centre first' approach, doing so having regard to the specific local circumstances of Crawley. As per national policy, Submission Crawley Borough Local Plan, May 2023 (Submission Document Reference: CBLP/01) Policy TC5 applies a 'town centre first' approach, setting out, as required by the National Planning Policy Framework (NPPF), 2021, paragraph 87-90 (Post-Submission Document Reference: PS/DS/NPPF/01) the sequential and impact tests. CBC has discussed the locally specific approach to impact testing under Question 7.1.

- 7.5.2 With regards to the sequential test, Policy TC5 applies this for all main town centre uses. However, CBC does consider there to be specific circumstances in Crawley that justify a local application of the sequential test for hotel & visitor accommodation and offices.
- 7.5.3 In relation to hotel & visitor accommodation, this is discussed in the council's Written Statement response to Question 4.34 (Examination Document Reference: CBC/MIQ/004).
- 7.5.4 Office development is, of course, supported within Crawley Town Centre, though the sequential test as worded in national policy does not reflect local circumstances in Crawley. Specifically, as a planned new town Crawley has dedicated Main Employment Areas, including Manor Royal, that are specifically planned as locations for economic growth. CBC considers the Main Employment Areas to be appropriate locations for office development. Therefore, the submission Local Plan proposes that the sequential test is not applied where office development is proposed within the Main Employment Areas. A similar approach is already applied in the adopted Crawley Borough Local Plan 2015 (Submission Document Reference: CBLP/02) at paragraph 5.40, where the sequential test is not applied for office use proposed within Manor Royal.
- 7.5.5 With regards to permitted development rights, the council has Article 4 Directions that remove the Class MA permitted development right in place at several Main Employment Areas. The council has not sought to introduce an equivalent Article 4 Direction in the town centre, recognising that it is a sustainable location for residential uses, and having regard to the NPPF Paragraph 86(f) focus on the role of residential in supporting town centres. Where planning permission is required for change of use to residential, CBC consider it appropriate to apply the Policy EC2 loss of employment test, helping to ensure that an appropriate balance is achieved between residential and commercial uses within the town centre.
- 7.5.6 CBC recognise that a possibly unintended consequence of Use Class E is that it potentially undermines application of the town centre first approach, given that it allows freedom of movement across the various commercial uses that fall within the Class. For example, if a former light industrial unit (formerly within Use Class B1(C)) in an out-of-centre location was proposed to be converted to a supermarket, with both uses now being within Use Class E. The council is unable to prevent this for existing units unless there is a pre-existing condition in place.
- 7.5.7 However, where new Class E development is permitted in out-of-centre locations, the council will normally consider applying a condition to restrict the authorised use to that which has been justified in the application submission. This ensures that unintended adverse impacts on town centre vitality and viability are avoided. Avoidance of such movement within Class E may be necessary for other reasons, including in relation to water neutrality and parking provision, where using the example above, the requirements of a supermarket will be very different to those of a light industrial unit. Clearly, this is a development management tool rather than a policy function and should be considered on a case-by-case basis. For clarity, the council suggest adding wording around this issue to the supporting text of Policy TC5 as follows:

Suggested additional Paragraph 11.43:

Introduction of Use Class E has placed a wide range of uses including retail, food, financial services, gyms, healthcare, nurseries, offices, and light industry into a single use class, allowing movement within that Class unless otherwise restricted. As the provisions of Use Class E are not linked to spatial boundaries, it potentially undermines application of the town centre first approach. Therefore, where new Class E development is permitted, the council will consider applying a condition to restrict the authorised use to that which has been justified in the application submission. This ensures that unintended adverse impacts on town centre vitality and viability are avoided. Avoidance of such movement within Class E may be necessary for other reasons, including in relation to water neutrality and parking provision.

The existing Paragraph 11.43 would become a new Paragraph 11.44.

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

Issue 2: Individual town centre sites.

- 7.6 Question 7.6: With regard to any potential development of Crawley Station and surrounding car parks, is the provision of alternative or replacement parking necessary? Should the Infrastructure Plan support any improvement of the station and Brighton Road level crossing that may be required as a result of an increase in usage deriving from town centre development?
- 7.6.1 Outline planning permission (CR/2016/0294/OUT) granted permission for demolition of Overline House (offices above the station) and the erection of 308 flats and a replacement railway station. The demolition of Overline House has not taken place, though the improvements to the railway station and its public car park (located north and east of the station building) are now complete, with just a minor drop in public parking spaces serving the station arising from the public realm improvements and formation of an access ramp to replace the former staircase. The disused car park to the west of the station was associated with the former office use of Overline House (proposed for conversion to residential) and did not relate to the railway station. It was not a public car park.
- 7.6.2 The Local Planning Authority is currently considering a full planning application (CR/2019/0660/FUL) for the conversion of Overline House to residential, which includes further station improvements and small scale supporting office and retail, and also a reserved matters application (CR/2019/0602/ARM) covering the former car park to the west. As set out in the table in Section 5.1 of Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/03) these applications have a resolution to grant planning permission subject to s106, with the water neutrality issue needing to be resolved.
- 7.6.3 Turning to parking associated with the residential elements, the outline permission proposed 111 car parking spaces to cater for the proposed 308 flats (0.36 spaces per dwelling). Given that the site represents the most sustainable location within Crawley Town Centre (i.e. at the railway and bus stations), the level of parking

provision proposed was considered acceptable, albeit with a Travel Plan required by condition. The current full application (CR/2019/0660/FUL) would retain Overline House for conversion to flatted units, meaning there would be less ground floor area available across the site for resident parking. On this basis, the revised scheme would deliver 75 car parking spaces at ground floor level to cater for a total of 306 flats (0.25 spaces per dwelling). Whilst representing a reduction in residential parking from the previous scheme, officers and WSCC Highways have no objection given the highly sustainable location, with the allocation of spaces to be agreed through a Parking Management Plan.

- 7.6.4 The council has applied this approach for other Town Centre residential schemes, with a similar level of car parking approved on nearby Town Centre schemes at Moka, Longley House, Geraint Thomas House and Zurich House. By way of comparison, the Moka scheme provided 0.11 spaces per dwelling and Geraint Thomas House 0.23 spaces per flat. In each case, a lower amount of residential parking is justified given the highly sustainable Town Centre location and proximity to sustainable transport links. This approach is consistent with the Transport Study (Submission Document Ref: ES/ST/01a), the Crawley Local Cycling and Walking Infrastructure Plan (Submission Document Ref: PS/ES/ST/03) and the Crawley New Directions Transport Strategy (Submission Document Ref: ES/ST/01b) which aim to promote sustainable transport modes over private car. For Overline House, the proposed traffic movements at peak times is less than would be associated with the existing lawful office use.
- 7.6.5 With regard to the Brighton Road level crossing, CBC notes that the key Town Centre access from the south is via Southgate Avenue, a route that passes underneath the railway line and is not therefore subject to delay associated with rail movements. The Brighton Road level crossing has not been raised as an issue by WSCC Highways nor Network Rail in relation to the Station Gateway or Moka applications. Given the council's approach of limiting the number of car parking spaces associated with Town Centre residential development, because sustainable transport modes are being prioritised and town centre development is in the most accessible location, it is not considered necessary for the Infrastructure Delivery Plan to support improvements to Brighton Road level crossing.
- 7.7 [Question 7.7: Is it necessary for the Crawley College site to be masterplanned as a whole?](#)
- 7.7.1 The Crawley College site is identified by Local Plan Policy TC3 for mixed use development with priority for education. This recognises that Crawley College has identified a considerable amount of underused space within its existing campus buildings, with the College's Space Utilisation Survey finding only 29% of teaching space to be fully used with 52% of total floorspace unallocated on average.
- 7.7.2 There is potential for land at the Crawley College site to be more effectively used, whilst ensuring that the principal educational function of the site is retained. Redevelopment of the wider site will enable, over time, the College to develop a modern, high quality educational facility whilst helping to address Crawley's housing needs. The S106 legal agreement relating to planning permission CR/2019/0403/FUL (the Science Technology Engineering and Maths (STEM) building) requires that for

the Crawley College site, any development must accord with an appropriate master plan agreed with the Local Planning Authority and covering the whole campus and will be required to demonstrate that it can be achieved in a manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility.

- 7.7.3 A masterplan for the Crawley College site as a whole has already been completed. The specific reason for this requirement was to ensure that where specific parcels of land within the college campus are proposed for residential development, this can be delivered in a way that does not undermine the principal educational use of the site, including its continued operation as development takes place.
- 7.7.4 The requirement for the masterplan is an existing commitment secured through the S106 legal agreement relating to planning permission CR/2019/0403/FUL for development of a Science Technology Engineering and Maths (STEM) building. This sets out that: *“any development must accord with an appropriate master plan agreed with the Local Planning Authority and covering the whole campus and will be required to demonstrate that it can be achieved in a manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility”*.
- 7.7.5 The Masterplan has been prepared through joint working and collaboration between CBC and the Chichester College Group and it is intended that it will be captured in future as part of an area wide town centre design code. Its approach supports the college in making the best use of its campus, ensuring that its core educational use is retained whilst enabling land that is no longer required for education to be released on a planned, rather than piecemeal, basis.
- 7.7.6 As such, it is considered that the masterplan approach referred to in Policy TC3 is necessary and justified. However, CBC considers that the following modifications are necessary to reflect that the Crawley College Masterplan is now prepared, and to add further context:

Suggested Modification to Policy TC3 (last paragraph):

For the Crawley College site, any development must accord with [the Crawley College Masterplan](#) or an appropriate [amended](#) master plan agreed with the Local Planning Authority and covering the whole campus and will be required to demonstrate that it can be achieved in a manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility.

Suggested New Paragraph to follow existing 11.26:

[Crawley College has identified a considerable amount of underused space within its existing campus buildings, and there is potential for land to be more effectively used, whilst ensuring that the principal educational function of the site is retained. Redevelopment of the wider site will enable, over time, the College to develop a modern, high quality educational facility whilst helping to address Crawley's housing needs. A Master Plan covering the whole campus has been prepared and agreed with the council, in accordance with a s106 legal agreement relating to the planning permission for the Science Technology Engineering and Maths \(STEM\) building \(CR/2019/0403/FUL.\) Any future development on the Crawley College site must accord with the master plan \(or an appropriate amended master plan agreed with the Local Planning Authority\) and demonstrate that it can be achieved in a](#)

manner that prioritises the ongoing viability and function of Crawley College as a Further Education facility.

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

Appendix A: Response to Matters 7.1 and 7.5, Nexus Update, 2023

Crawley Local Plan 2024-2040 Examination

Response to Matters 7.1 and 7.5

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1. Introduction

- 1.1 This Response has been produced by Nexus Planning ('Nexus') at the request of Crawley Borough Council ('the Council'). Nexus was employed by the Council to prepare the Borough's 'Retail, Commercial Leisure & Town Centre Neighbourhood Needs Assessment' (the 'Needs Assessment') in 2019. The Needs Assessment was issued to the Council in final in January 2020.
- 1.2 The Council has subsequently relied upon the findings of the Needs Assessment to inform the evolution of some of its Town Centre policies. Specific to this, we are asked to assist with two specific questions raised in the Inspectors' Matters, Issues and Questions ('MIQs') dated 9th October 2023, namely:
- IMQ7.1 – Is the plan's evidence for setting an impact threshold of 500 square metres, departing from the NPPF's (paragraph 90) default threshold of 2,500 square metres sufficiently robust?; and
 - IMQ 7.5 – Does the plan sufficiently cater for a 'town centre first' approach, having regard to opportunities for permitted development changes of use both within and outside the town centre?
- 1.3 We address these questions individually in Sections 2 and 3 of this document.

2. Matter 7.1 – Retail Impact Threshold

Legislative Context

2.1 The National Planning Policy Framework ('NPPF') explains at Paragraph 90 that:

90. When assessing applications for retail and leisure development outside town centres, which are not in accordance with an up-to-date plan, local planning authorities should require an impact assessment if the development is over a proportionate, locally set floorspace threshold (if there is no locally set threshold, the default threshold is 2,500m² of gross floorspace). This should include assessment of:
- a) the impact of the proposal on existing, committed and planned public and private investment in a centre or centres in the catchment area of the proposal; and
 - b) the impact of the proposal on town centre vitality and viability, including local consumer choice and trade in the town centre and the wider retail catchment (as applicable to the scale and nature of the scheme).

2.2 Planning Practice Guidance ('PPG') on Town Centres and Retail further elaborates on this at Paragraph 015:

When should the impact test be used?

The impact test only applies to proposals exceeding 2,500 square metres gross of floorspace* unless a different locally appropriate threshold is set by the local planning authority. In setting a locally appropriate threshold it will be important to consider the:

- scale of proposals relative to town centres
- the existing viability and vitality of town centres
- cumulative effects of recent developments
- whether local town centres are vulnerable
- likely effects of development on any town centre strategy
- impact on any other planned investment

2.3 It is therefore evident that any Local Impact Threshold which deviates from the nationally set default threshold of 2,500 sq m will have necessitated a consideration of the six bullet points under Paragraph 015 of the PPG.

The Needs Assessment (2020)

2.4 The Needs Assessment prepared by Nexus in 2020 was supported by a significant weight of empirical data and research. A key pillar of the assessment was a household telephone survey of 1,209 households in Crawley Borough and its immediate surrounds, prepared by NEMS Market Research. That survey sought to understand quantitative retail and leisure shopping patterns, as well as a range of qualitative views on Crawley Town Centre and a range of other matters. The survey findings were included in full at Appendix C to the Needs Assessment, with detailed assessment and analysis by Nexus at Section 2 ('Market Share and Capacity') and at Appendixes D and E (Statistical Tables).

2.5 The survey was also backed up by a detailed Health-check assessment of Crawley Town Centre, prepared by Nexus, and carried out in accord with the suggested range of indicators set out at Paragraph 006 of the Town Centres and Retail PPG.

This was contained at Section 4 ('Town Centre Assessment') of the Needs Assessment.

2.6 Building on these two aspects, Nexus provided a series of recommendations at Section 5 of the Needs Assessment ('Policy Recommendations'). Pertinent to Matter 7.1, this included a recommendation that:

- 5.32 In accordance with the NPPF, retail, office and leisure developments greater than 2,500 sq m proposed in edge-of-centre and out-of-centre locations will be subject to the assessment of the impact criteria set out by Paragraph 89.
- 5.33 Where appropriate, Local Authorities are entitled to identify local thresholds in accordance with the following considerations identified within the PPG ('Town centres and retail', Paragraph 15):
- scale of proposals relative to town centres;
 - the existing viability and vitality of town centres;
 - cumulative effects of recent developments;
 - whether local town centres are vulnerable;
 - likely effects of development on any town centre strategy; and
 - impact on any other planned investment.
- 5.34 The existing Crawley Local Plan 2015-2030, does not adopt a locally set threshold, and as such the national threshold of 2,500 sq m applies for new retail developments outside of Crawley Town Centre's Primary Shopping Area, or the boundary of any other designated centre across the Borough.
- 5.35 In addition to the guidance within the PPG, in order to robustly justify any proposed local thresholds, we have considered the overall scale and draw of the centre, the number of available opportunity sites and market patterns to establish what scale of proposal would be likely to impact upon the vitality and viability of the centre.
- 5.36 Where Experian Goad data is available, we have calculated the average size of occupied town centre units across the Town Centre. The average unit size within Crawley Town Centre is 294 sq m and the median is 130 sq m, with units ranging from 10 sq m to 8,430 sq m. Additionally, the average convenience goods commitment measures 280 sq m and the average comparison goods commitment measures 694 sq m (considering a relatively conservative 80% net to gross split of floor areas). Notwithstanding the relative strength of Crawley Borough as a whole, the Town Centre specifically has suffered a fall in market share of overall spending at physical stores over the last decade; this is seen across both convenience goods (from 30.4% to 13.8%) and comparison goods (from 42.6% to 23.1%), as shoppers turned to out of centre retailers.
- 5.37 We are cognisant of the potential for this to continue to cumulatively 'chip away' at the vitality and viability of the centre. In light of the above, it is our view that retail developments falling below the current national threshold of 2,500 sq m have the potential to impact on the health of the Town Centre.

- 5.38 We have also had regard to precedent set through recent appeal decisions. Noting the average size of units identified above, recent decisions are relevant in highlighting cases where proposals for smaller units may result in an adverse impact on a centre. Whilst the significance of levels of impact on town centres should be considered as a matter of fact and degree in each case, it is nonetheless notable that planning appeals in Luton Borough (ref: APP/B0230/A/13/2203864) and the London Borough of Tower Hamlets (APP/E5900/A/14/2217680) have been dismissed by the Secretary of State for retail proposals of just 121 sq m and 261 sq m, respectively.
- 5.39 Whilst we would not necessarily recommend adopting a local threshold as low as the appeal cases referenced, it is indicative of the potential impact of smaller units in out-of-centre retail park locations that can be seen to compete directly with the Town Centre offer. We are also mindful of the potential necessity of larger retail units within Crawley Town Centre (such as the former Morrisons unit) to sub-divide large floorplates in order to provide flexible retail units more suitable to modern retailing.
- 5.40 We therefore conclude that the centres across the Borough are potentially vulnerable to competing edge-of-centre and out-of-centre retail developments that would jeopardise the vitality and viability of the centres.
- 5.41 As such, we recommend a flat locally set threshold of **500 sq m across the Borough**. This threshold would capture larger convenience retailers, whilst avoiding placing an undue burden on smaller stores and extensions, as well as the majority of comparison goods stores likely to trade from out-of-centre retail parks that would have the potential to generate a cumulative draw.
- 5.42 We would stress that whilst a locally set threshold would require the submission of an impact assessment for all edge-of-centre and out-of-centre developments exceeding the recommended thresholds, national guidance dictates that the impact test should be undertaken in a proportionate and locally appropriate way, commensurate to the scale of development proposed.
- 5.43 The level of detail would typically be agreed with Council officers during the pre-application process in order to avoid overly onerous requirements that may otherwise restrict and delay development opportunities from coming forward.

- 2.7 The rationale for the recommendation in 2020 was therefore built on an assessment of the PPG factors, most notably 'scale of proposals relative to town centres', 'the existing vitality and viability of the town centre', 'cumulative effects of recent developments' and 'whether local town centres are vulnerable'.

2023 Update

- 2.8 In light of the question raised at Matter 7.1, the Council has asked Nexus to objectively consider this matter again at the current time. In order to do so, the Council commissioned Nexus to undertake an updated Health-check of Crawley Town Centre, again using the PPG methodology. Accordingly, we visited the Town Centre on 9th November 2023 and have prepared an updated health-check. This is included at **Appendix A** to this document.
- 2.9 The household telephone survey prepared in 2019 is a substantial undertaking, and in view of the relative lack of new retail development on the ground since that time (incorporating the Covid-19 pandemic period), both Nexus and the

Council consider that the 2019 survey remains a reliable source in terms of informing market share attracted to the Town Centre.

- 2.10 Within this context, we therefore address all six of the bullet points under Paragraph 15 of the Town Centres and Retail PPG.

Scale of Proposals Relative to Town Centres

- 2.11 The 2019 Needs Assessment set out a number of unit sizes in order to understand the relative size of proposed development against existing provision. In order to update that analysis, we have consulted the latest available Experian Goad Survey for Crawley Town Centre, which at the time of writing was a survey carried out on 12th September 2022. The 2019 and 2022 data contrasts as follows:

Figure 2.1 – Unit Sizes, Crawley Town Centre

Crawley Town Centre	2019 Needs Assessment	2022 Data
Average Unit Size	294 sq m	292 sq m
Average Convenience Goods Unit Size	664 sq m	379 sq m
Average Comparison Goods Unit Size	404 sq m	385 sq m
Average Service Goods Units Size	163 sq m	157 sq m
Average Vacant unit Size	261 sq m	524 sq m ¹
Average Convenience Goods Commitment Unit Size	280 sq m	217 sq m
Average Comparison Goods Commitment Unit Size	694 sq m	567 sq m

- 2.12 The 2019 Needs Assessment concluded that the scale of committed proposals (280 sq m and 694 sq m) was similar in scale to the size of units available in the Town Centre and that this lent weight to an overall conclusion that a lower impact threshold should be sought. The average unit size (294 sq m) was similar to the average size of convenience goods units (280 sq m) and vacant units (261 sq m) in the Town Centre
- 2.13 Having analysed a range of comparative data at the current time, it is evident that this position continues. Average unit size has remained similar (292 sq m) and the scale of current commitments² has remained similar (217 sq m and 567 sq m).

¹ The significant increase in average vacant unit size is largely as a result of the closure of the Morrisons store in the Town Centre over the intervening period.

² At the time of writing there is currently one convenience goods commitment of scale (CR/2019/0542/FUL) and two comparison goods commitments of scale (CR/2019/0542/FUL + CR/2018/0196/FUL).

2.14 This consideration therefore remains relevant to consideration of local impact threshold, as the unit size evidenced to be proposed by operators at the current time are similar in scale to those found in the Town Centre.

2.15 At 2.43 of Appendix A (see below), we list the stated requirements of national multiple retail or leisure businesses for new units in Crawley. This list is derived from www.therequirementlist.com which Nexus subscribes to. Whilst this list can only be indicative, and does not indicate concrete demand, it is though helpful in understanding the range of operators who might wish to open new premises in the Crawley area in the near future. As can be seen, all but one of the retailers (The Range) is seeking floorspace which would otherwise not qualify for retail impact assessment at the national threshold if it were to be brought forward outside Crawley Town Centre. This lends further weight to the scale of local impact threshold recommended (i.e. 500 sq m), whereby the majority of unit sizes detailed on that list would require impact assessment under the local threshold.

The Existing Vitality and Viability of Town Centres

2.16 Please find a fully updated Health-Check of Crawley Town Centre contained at **Appendix A**. The health check was carried out in November 2023 and we draw further on its findings below.

Cumulative Effects of Recent Developments

2.17 We are not aware on any recent developments which will have cumulatively impacted to any significant degree on Crawley Town Centre.

Whether Local Town Centres are Vulnerable

2.18 The 2019 Needs Assessment concluded that Crawley Town Centre was vulnerable as it had experienced both a reduction in convenience goods (30.4% to 13.8%) and comparison goods (42.6% to 23.1%) market share over the period 2010-2019.

2.19 The 2010 figures were derived from the previous 'Crawley Retail and Capacity and Impact Study 2010' (DTZ) and 'Crawley Retail Capacity Study Update 2013' (DTZ).

2.20 We have been asked to comment on representations made under REP/165 (DT Last Mile Retail) in respect of the contrast between the 2019 and 2010 figures in the 2019 Needs Assessment. We comment as follows:

- Study Area – the representation notes that the Study Areas for the two household telephone surveys were not the same. However, as can be seen when the two Study Areas are contrast at **Appendix B** to this response, they are very nearly identical, if not actually identical. The purpose of the Study Area adopted in 2019 was to allow side-by-side comparison. Of relevance to the figures under consideration, the 2019 Study drew on its Zones 1a and 1b as the area which broadly comprised the Borough, and the 2010 and 2013 Studies drew on their Zone 1. Again, as shown at Appendix B, the two are almost identical. Both use the same postcode areas, and any difference may be as simple as the DTZ report using smoothed lines, where the Nexus report used more detailed lines. We therefore find no meaningful support for the suggestion that the Study Areas are not directly comparable.
- Questionnaire wording – There are small wording differences between the questionnaires used for the 2010 and 2019 surveys. The example noted is that the 2010 survey asked where people do 'most' of their food shopping, whereas the 2019 survey asked people where they 'last' did their food shopping. The change in wording was introduced in 2019 in order to pick up visits to stores which might not properly be accounted for when people are only thinking about where they do most of their food shopping. For this reason, we do agree that there is likely to be a slightly greater degree of accuracy to the 2019 results and that the two are not directly comparable for that reason. However, we suggest that the difference is likely to be minor as in the vast majority of instances, where

people do ‘most’ of their food shopping will also be where they ‘last’ did their food shopping. Importantly, we think it likely that the added granularity to the 2019 questionnaire will, if anything, have resulted in an increase in the market share attributed to Crawley Town Centre as it will be the sort of small convenience goods stores found in the Town Centre which might have been overlooked under the wording around where people carried out ‘most’ of their food shopping. Accordingly, this point may not advance the case of the objector as the added granularity to the 2019 wording may have increased the market share attributed to Crawley Town Centre.

- Goods categorisation – The representation noted that the wording of various comparison goods categories changed between 2010 and 2019. This was dictated by Experian, the data provider, changing their own categorisation over that period. However, whilst this may have made some small difference between categories, what both the 2010 and 2019 studies do is to accumulate those figures and analyse them as a total comparison goods figure. Ultimately therefore, this is a like-for-like comparison as it contrasts all comparison goods.
- Asda store – The representation suggests that the Asda store on Peglar Way was included within Crawley Town Centre at the time of 2010/2013 Studies but was excluded by the time of the 2019 Study. Having discussed this matter with the Council and obtained a copy of the telephone survey utilised by DTZ in 2010, we agree that DTZ had misplaced the Asda store within the Town Centre for the purposes of their statistical assessment of market share. The is notwithstanding the DTZ 2010 Study noting at 2.11 and 6.2 that Asda at Peglar Way is an “edge-of-centre foodstore” (i.e. not within the Town Centre). The representation is therefore correct to suggest that the decrease in Town Centre convenience goods market share is not as great as it would at first have seemed. On a like-for-like basis, the decrease in convenience goods fortunes is still negative, but on a like-for-like basis with Asda included, is from 30.4% market share in 2010 to 26.5% market share in 2019.
- Comparison Goods Market Share – The representation picks up an error at 5.36 of the 2020 Needs Assessment whereby the decline in Crawley Town Centre’s comparison goods market share had been misquoted as being from a 42.6% market share in 2010 to a 23.1% market share in 2019. Having reviewed the 2020 Needs Assessment, we agree that the 23.1% figure was mis-quoted and should have been a figure of 40.5% in line with Figure 2.19 and the tables at Appendix D & E. For the avoidance of doubt, this mis-quotation does not have any impact on any other part of the Study and all statistical analysis in those Appendices adopts the correct figure. However, for the purposes of analysing the Local Impact threshold methodology, we agree with the representation that it is relevant to consider the revised decline of 42.6% in 2010 to 40.5% in 2019.

2.21 In light of the foregoing, and of the five specific points raised in the representation, we find that the first three are likely to have little or no bearing on our original findings. The fourth and fifth are material and we weigh this in the balance below.

2.22 Tuning to a modern-day consideration of whether Crawley Town Centre is vulnerable, we draw on the following:

- As corrected, there is evidenced to be a meaningful decline in convenience goods market share over the period 2010-2019 from 30.4% to 26.5%.
- As corrected, there is evidenced to be a small decline in comparison goods market share over the period 2010-2019 from 42.6% to 40.5%.
- The updated Heath-check at Appendix A shows that:

- Vacant units in the Town Centre are increasing over time. They stand at 12.5% at November 2023. This is an increase from 10.8% in 2019, and from 7.5% in 2010³.
- Vacant floorspace in the Town Centre has increased sharply to 23.1%. This contrasts to 8.9% in 2019 and 4.3% in 2010.
- Average market rents have declined from around £31.50/sq ft in 2019 to £30.15/sq ft in 2023.
- Market yield has negatively increased from 6.8% in 2019 to 7.8% in 2023.

2.23 In light of the foregoing, each of the key health-check indicators we have examined is evidenced to have experienced a decline. We therefore conclude that the latest evidence remains suggestive that Crawley Town Centre is vulnerable to out-of-centre competition.

Likely Effects of Development on any Town Centre Strategy

2.24 Since the time of our 2019 Study, the Council has progressed a detailed 'Town Centre Regeneration Programme'. The latest version of the proposals is dated March 2023 and this document is included at **Appendix C**. The Programme seeks to best utilise £21.1m of Town Fund money, as well as £15.4m secured from the Coast to Capital Local Enterprise Partnership.

2.25 With funding secured, and a detailed programme very recently put in place, it is evident that there is a cogent Town Centre Strategy which could be threatened by undue out-of-centre retail growth which might further detract footfall from the Town Centre. The proposed local impact threshold of 500 sq m therefore would assist in adding further support for progressing the aims and objectives of the Programme which, as opposite (Page 22), specifically notes the importance of 'protecting the retail core' and promoting a 'town centre first approach'.

Crawley A PLACE TO INSPIRE

Complementary policy

- **The Crawley Local Plan 2015 and emerging 2022 to 2037 Local Plan:** The council has developed clear planning policy and guidance to enable the sustainable regeneration of the town centre through Crawley's Local Plan which is being refreshed for the period 2022 to 2037.
- **Ensure 'active and engaging frontages' at ground floor level**
- **Promote a 'town centre first' approach to considering proposals for main town centre uses in Crawley, including for hotel and visitor accommodation**
- **Highlight 'key opportunity sites' for mixed use development within the town centre boundary, where development must demonstrate that it "positively contributes to the vitality and viability of Crawley town centre and sustainable economic growth and job creation in the borough"**
- **Promote a vibrant town centre with a successful evening and night-time economy**
- **Support the creative industries and encourage innovation**
- **Managing the balance between commercial and residential uses.**

The emerging Local Plan highlights the town centre as an economic centre of Crawley and a key component of Crawley's economic role in the sub-region, stating that "redeveloping and revitalising the town centre...will reinforce the status of Crawley as the place to do business in the south east. The revitalised town centre will be the heart of the town, providing a central point for local people and others from across the region to enjoy social activities, shopping, culture and entertainment both during the day and at night. It will have a welcoming and attractive family-friendly environment. The town centre will become a business growth hub and a recognised neighbourhood with local facilities supporting its residents."

Over 2,000 residential dwellings are set to come forward within the town centre during the Plan period and with a growing residential population, the "town centre is increasingly becoming a neighbourhood in its own right, requiring supporting facilities and services required to meet the needs of people that live there". The relevant Local Plan policies for the town centre respond to the need to:

- **Protect the retail core with flexibility to enable a broad range of other uses, where appropriate, capable of diversifying Crawley's offer**
- **Facilitate the development of town centre neighbourhood facilities/amenities**

The appropriate balance of mixed uses across the area is imperative in order to contribute to a vibrant new neighbourhood and a dynamic hive of business and economic activity in the town centre.

The council is committed to formulating complementary policy which allows it to protect the unique character of Crawley's new town architecture, including the historic High Street, and distinctive uniformity, whilst encouraging and enabling high-quality development proposals within the town centre that are in keeping with the surrounding environment.

³ Table 2.1, Crawley Retail impact and Capacity Study 2010.

Impact on any Other Planned Investment

- 2.26 Other than the Town Centre Regeneration Programme, we are not aware of any additional planned Investment which would factor into thinking around the local impact threshold.

Conclusion

- 2.27 The PPG sets out a range of criteria which are relevant to considering whether a Local Impact Threshold should be imposed. This Response has considered each in turn.
- 2.28 Our assessment is that as a result of the likely scale of proposals relative to the Town Centre, the evidenced vulnerability of the Town Centre, and the potential effects of development outside the Town Centre on the Town Centre Strategy, it remains appropriate to seek a Local Impact Threshold for Crawley Town Centre.
- 2.29 Our recommendation remains that this is set at 500 sq m having undertaken the exercise at Figure 2.1 and its accompanying text.

3. Matter 7.5 – Permitted Development Changes

- 3.1 The Inspectors question seeks to understand whether the Plan sufficiently caters for a ‘town centre first’ approach, having regard to opportunities for permitted development changes of use both within and outside the Town Centre.
- 3.2 Significant changes to the Use Classes Order have been enacted through the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020, which came into force on 1st September 2020.
- 3.3 The amendments include the revocation of Parts A and D, and the introduction of three new Use Classes, these being Classes E, F1 and F2. The Government’s objective is that the changes will support the revival of the high street and allow for greater flexibility in changing uses within Town Centres without the need for planning permission.
- 3.4 In addition to the three new Use Classes, the changes also result in some changes in respect of uses classified as sui generis. In practical terms, the changes comprise:
- **Use Class E** – Commercial, business and service uses include: shops or retail; cafes or restaurants; financial services; professional services; any service appropriate to provide in a commercial, business or service locality; indoor sports, recreation or fitness; medical or health services; crèche, day nursery or day centre; and, offices.
 - **Use Class F1** – Learning and non-residential institutions include any non-residential use for the: provision of education; display of works of art; museum; public library or public reading room; public hall or exhibition hall; for or in connection with public worship or religious instruction; or, as a law court.
 - **Use Class F2** – Local community uses include: a shop selling mostly essential goods, including food, no larger than 280 sqm and where there is no other such facility within 1,000 metres radius of the shop’s location. A hall or meeting place for the local community, an area or place for outdoor sport or recreation and an indoor or outdoor swimming pool or skating rink.
 - **Sui Generis** – Use within this Class now include a public house, wine bar or drinking establishment; a drinking establishment with expanded food provision; as a hot food takeaway for the sale of hot food where consumption of that food is mostly undertaken off the premises; live music venue; cinema; concert hall; bingo hall; or, dance hall.
- 3.5 The introduction of Class E placed a wide range of uses including retail, food, financial services, gyms, healthcare, nurseries, offices, and light industry into a single use class. Unless restrictive planning conditions extinguish the provisions of Class E, the ability to significant change the commercial use of premises without planning permission allows centres to evolve in a flexible manner.
- 3.6 However, the provisions of the Use Classes Order are not linked to any spatial considerations. As such, the expanded Use Class E applies equally to both Town Centres and out of centre locations, and there may be unintended consequences in providing for additional flexibility across Class E outside of Town Centres. Accordingly, it may be necessary for a Council to apply restrictive conditions to certain forms of development in order to restrict the authorised use to that which has been justified in the application submission. This ensures that unacceptable impacts do not arise from future Class E development.
- 3.7 Linked to this, an amendment was made to the General Permitted Development (England) Order 2015 (the ‘GPDO’) in March 2021. This allows for the change of use from Class E properties to residential from August 2021 (extending a right that had previously been restricted to office uses). This permitted development right is subject to maximum size requirements, the property having been in use as Class E for two years, and the property having been vacant for three

months. In addition to this, 'prior approval' for the change of use must be sought from the planning authority. Restrictions on this right apply in conservation areas and for nurseries, as well as in areas that are covered by an Article 4 direction.

- 3.8 Turning then to how the Council has embraced these changes in the submission draft, Policy TC1 clearly establishes a support for retail development, as well as other town centre uses, within the different boundaries of the Town Centre. The greatest level of protection for the retail core (Class E) is within the ground floor of Primary Shopping Frontage properties, with a wider range of uses encouraged within the ground floors of the Secondary Shopping Frontage (to include Sui Generis drinking establishment and hot food takeaway uses). The effective and efficient use of upper floors is encouraged, including residential uses, in all parts of the Town Centre.
- 3.9 The rationale for Policy TC1 ('Primary Shopping Area') is set out at supporting paragraphs 11.12-11.15. The Council explain that they have sought to take account of the changes to the Use Class Order and General Permitted Development Order. They seek to protect the key retail frontages, whilst recognising that there needs to be a flexibility in modern town centres. Specifically, the Council is recognising the important role which residential development above ground floor can play in driving greater footfall and creating a day-round economy (i.e. supporting night-time uses as well as day-time uses). This is fundamental to the Town Centre Neighbourhood principles dealt with elsewhere in the Plan.
- 3.10 Areas outside the Primary and Secondary Shopping Frontages (together comprising the Primary Shopping Area), but within the wider Town Centre Boundary, do not receive the same levels of protection.
- 3.11 At Paragraph 11.15, the Council explicitly deal with the matter of striking a balance between protection of the retail core whilst encouraging residential development. The Plan states that:

It is not the intention to support residential development at the expense of the Town Centre as a main employment area, and whilst the principle of residential is supported in many cases, it is vital that a balance is struck to ensure that the retail and economic role of the Town Centre is not undermined. Residential development will not be acceptable in locations where this would impact negatively on the vitality and viability of the Town Centre, and residential development that would undermine the function of the Town Centre as a main employment area will not be permitted. The Primary Shopping Area should retain a retail-led economic focus, promoting active frontages and an engaging street scene.

- 3.12 Our judgment, based on the 2023 health-check at Appendix A, is that the Council has indeed struck the right balance. In our response to Matter 7.1, we have classified the Town Centre as potentially 'vulnerable'. A key pillar to that assessment is the level of vacancy, which is 12.5% of all units in the Town Centre and 23.1% of all floorspace. Whilst the Primary Shopping Area should be protected from any dilution of retail uses, there is clearly room for retail uses which exist outside the Primary Shopping Area, but within the Town Centre Boundary, to consolidate within the Primary Shopping Area in the future. This would assist with enabling residential development to support the vitality and viability of the Town Centre through greater footfall. We agree therefore with the proposed hierarchical approach to the protection of retail space.
- 3.13 Policy TC5 ('Town Centres First') covers the sequential and impact tests to be applied when out-of-centre Town Centre Use development is being considered. The Policy incorporates our recommended local impact threshold of 500 sq m, as considered under the Response to Matter 7.1. As we have outlined above though, the application of Class E and subsequent Permitted Development changes are not linked to spatial boundaries. Therefore, the greater flexibilities permitted are also available in out-of-centre locations, which could represent an unintended consequence of the legislature. An example of this could be if a former light industrial unit (formerly within Use Class B1(C)) in an out-of-centre location was proposed to be converted to a supermarket, with both uses now being within Use Class E.

- 3.14 Accordingly, it may be necessary for a Council to apply restrictive conditions to certain new developments in order to restrict the authorised use to that which has been justified in the application submission. This would assist in ensuring that unacceptable impacts do not arise from future Class E development. Clearly, this is a development management tool rather than a policy function and should be considered on a case-by-case basis. However, we suggest that it may be useful for the Council to consider adding some wording around this issue to the supporting text to Policy TC5, as a signal to the market that the Council will apply ‘town centre first’ considerations where it is reasonable to do so, and on a case-by-case basis.
- 3.15 The same control is not however possible in the case of existing buildings. However, the changes made to the Use Classes Order do not override or disapply the requirements of any existing planning condition to a pre-existing planning obligation which specifically prohibits a new use.

Appendix A - Crawley Town Centre Health-check (2023)

1. Town Centre Health-Checks

Methodology

- 1.1 Health checks are recognised as important planning ‘tools’ for appraising and monitoring the changes in the overall vitality and viability of town centres and informing both plan-making and decision-taking at the local level.
- 1.2 In this context, this Study provides a detailed health check assessment for Crawley Town Centre, as an update to the previous health check that Nexus completed in 2019.
- 1.3 The health check has been carried out in accordance with the Town Centres PPG, which sets out a number of key performance indicators used to help assess and monitor the overall health and performance of the centres. This has informed the creation of a matrix that sets out an easy-to-digest SWOT assessment. The general methodology is set out below.
- 1.4 The health-check was completed in November 2023.

SWOT Assessment

- 1.5 The Nexus SWOT assessment has been formulated to encompass the following:
 - 1. Retail Offer** - Using a combination of Experian GOAD data (where available) and site visit observations (where GOAD data was unavailable), we examine Experian GOAD categories i.e. convenience, comparison, service uses, and vacant units. We compare the results for Crawley Town Centre from previous data collected in 2019 to understand how compositions have changed over time, and against current national average benchmarks for each category (Experian Category Report, 2023) for all circa 1,950 centres and shopping locations covered by Experian.
 - 2. Vacant Units** - We contrast the current vacancy rate of Crawley Town Centre with the previous Retail Study and current national averages.
 - 3. Culture and Leisure** - Again using our GOAD base plans, we are able to identify the number of Leisure Services and assess the diversity of what is on offer.
 - 4. Unhealthy Businesses** - Looking at unhealthy businesses is important to understand the levels of health a centre is promoting. The Royal Society for Public Health published a report in 2018 titled ‘Health on the High Street: Running on empty’. The report uses “the Richter scale of health”¹ to measure the healthiness of different types of shops and other businesses on the high street. Vacant shops, tanning shops, off-licences, fast food outlets, bookmakers and high-cost credit outlets have been deemed the least health promoting, and are the categorisation in which this report will analyse unhealthy businesses.
 - 5. Business Confidence** - Rental values and market yield data has been obtained where available under license from CoStar. This data provides context to the business confidence in each centre.
 - 6. Partnership Working** - Partnership working is the level of engagement between the local authority, local business and the community.
 - 7. Access** - This is a Nexus assessment of how easy a centre is to reach; public transportation options; and access by other

¹ <https://www.rsph.org.uk/static/uploaded/dbdbb8e5-4375-4143-a3bb7c6455f398de.pdf>

modes (such as cycling or walking).

8. Car Parking – This is a Nexus assessment of the quantity, quality and cost of car parking.

9. Environmental Quality - A Nexus assessment of environmental quality including general cleanliness and attractiveness, the quality of buildings and the quality and provision of open spaces.

10. Historic Environment - An assessment of the historic environment is undertaken using Historic England mapping, along with a review of local conservation areas and locally designated heritage assets.

11. Street Markets – A Nexus assessment on the quality and provision of street markets.

12. Independent Trading - We consider the level of independent trading in a centre versus the number of national multiple retailers, where a national multiple is defined as operating in 9 units or more nationally. This reflects the uniqueness of a centre and the type of person that might be attracted to it.

13. Crime and Safety - The perception of safety in each centre has been assessed using site visit observations as well as crime data provided by the Police, and considers factors such as lighting, natural surveillance and traffic safety.

14. Night-time Economy - Using GOAD mapping, we assess businesses which typically operate beyond the standard working day, such as restaurants and public houses.

15. Public Investment - We have liaised with Crawley Borough Council to understand the extent of recent and planned public investment in each centre.

16. Technological Enhancement - A Nexus assessment of the level of technology operating in each centre e.g. through Apps/online discount schemes, the availability of WiFi, electric bike racks, electric car charging and other aspects.

17. Commercial Demand - We examine commercial demand by utilising occupier requirements for the local authority area from The Requirements List.

2. Crawley Town Centre Healthcheck

Description

- 2.1 Crawley Town Centre remains the main retail centre and leisure destination within Crawley Borough, and also remains a key shopping destination for people living in the wider area. The centre attracts visitors due to its wide range of shops, entertainment and recreational uses, and cafes, restaurants and bars. The centre has 407 units.

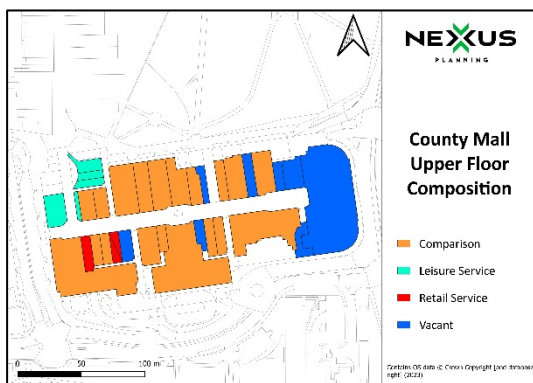
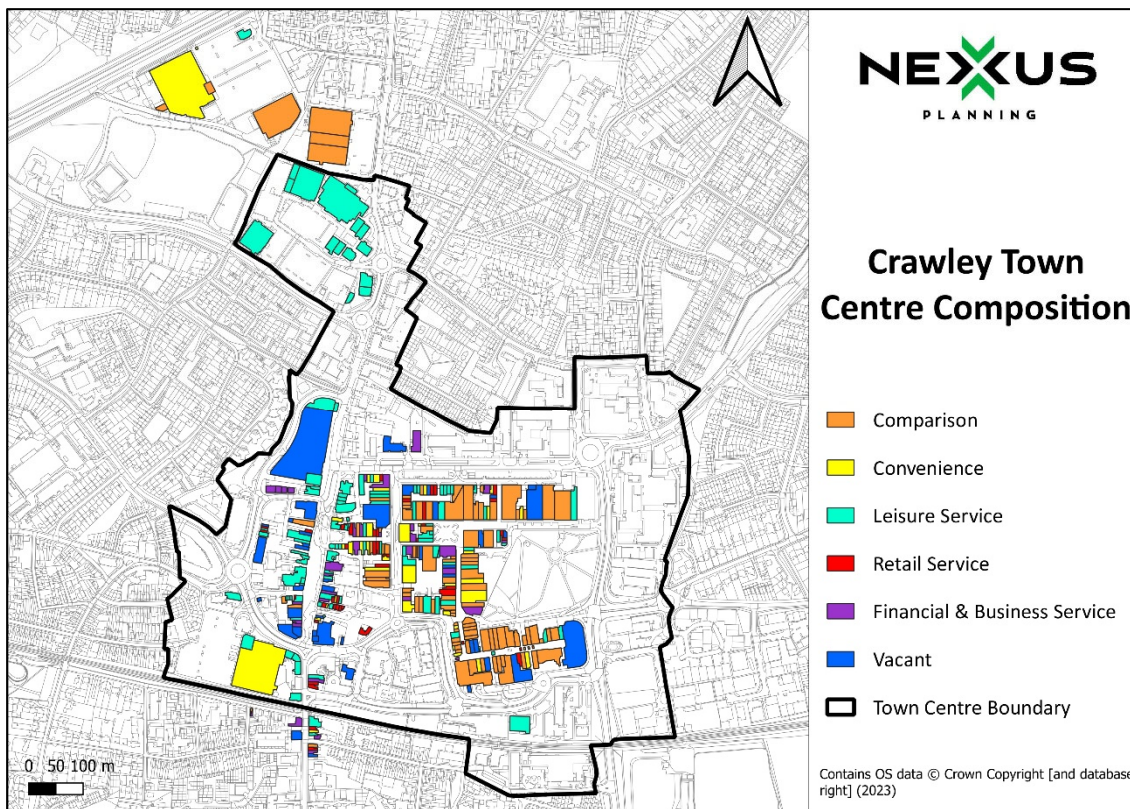
Figure 2.1.1 Photos of Crawley Town Centre



Source: Nexus Site Visit (November 2023)

Retail Offer

Figure 2.1.2 Maps showing composition of retail units in Crawley



- 2.2 A larger print version of the mapping is contained at **Appendix A**.
- 2.3 As shown in the Figure 2.5.1, the composition of Crawley Town Centre in terms of unit numbers is closely aligned to national averages.
- 2.4 When compared to the previous 2019 Study, there has been a decline in the number of comparison units and financial and business service units, whilst all other components have seen a small increase.

Table 2.4.1 Crawley Town Centre - Composition Table (Unit Numbers)

	Crawley Town Centre 2023	Crawley Town Centre 2023 (%)	National Average 2023 (%)	Crawley Town Centre 2019	Crawley Town Centre 2019 (%)	National Average 2019 (%)
Comparison	121	29.7%	26.9%	128	32.1%	29.7%
Convenience	37	9.1%	9.3%	31	7.8%	9.2%
Services (total)	198	48.6%	49.9%	197	49.4%	49.3%
<i>Retail</i>	<i>48</i>	<i>11.8%</i>	<i>15.8%</i>	<i>45</i>	<i>11.3%</i>	<i>14.9%</i>
<i>Leisure</i>	<i>112</i>	<i>27.5%</i>	<i>25.4%</i>	<i>108</i>	<i>27.1%</i>	<i>24.4%</i>
<i>Financial & Business</i>	<i>38</i>	<i>9.3%</i>	<i>8.7%</i>	<i>44</i>	<i>11.0%</i>	<i>10.0%</i>
Vacant	51	12.5%	13.8%	43	10.8%	11.6%
Total	407	-	-	399	-	-

- 2.5 Turning to consider floorspace in the Town Centre, we contrast below the 2019 Study findings with those most recently published by Experian Goad (September 2022).
- 2.6 The proportion of comparison goods floorspace exceeds national average, whilst the proportion of convenience and service floorspace is below national average.
- 2.7 Since 2019, there has been a reduction in comparison goods and service goods floorspace. There has been a small increase in convenience goods floorspace.

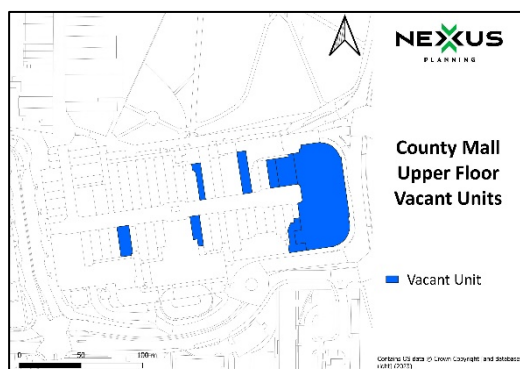
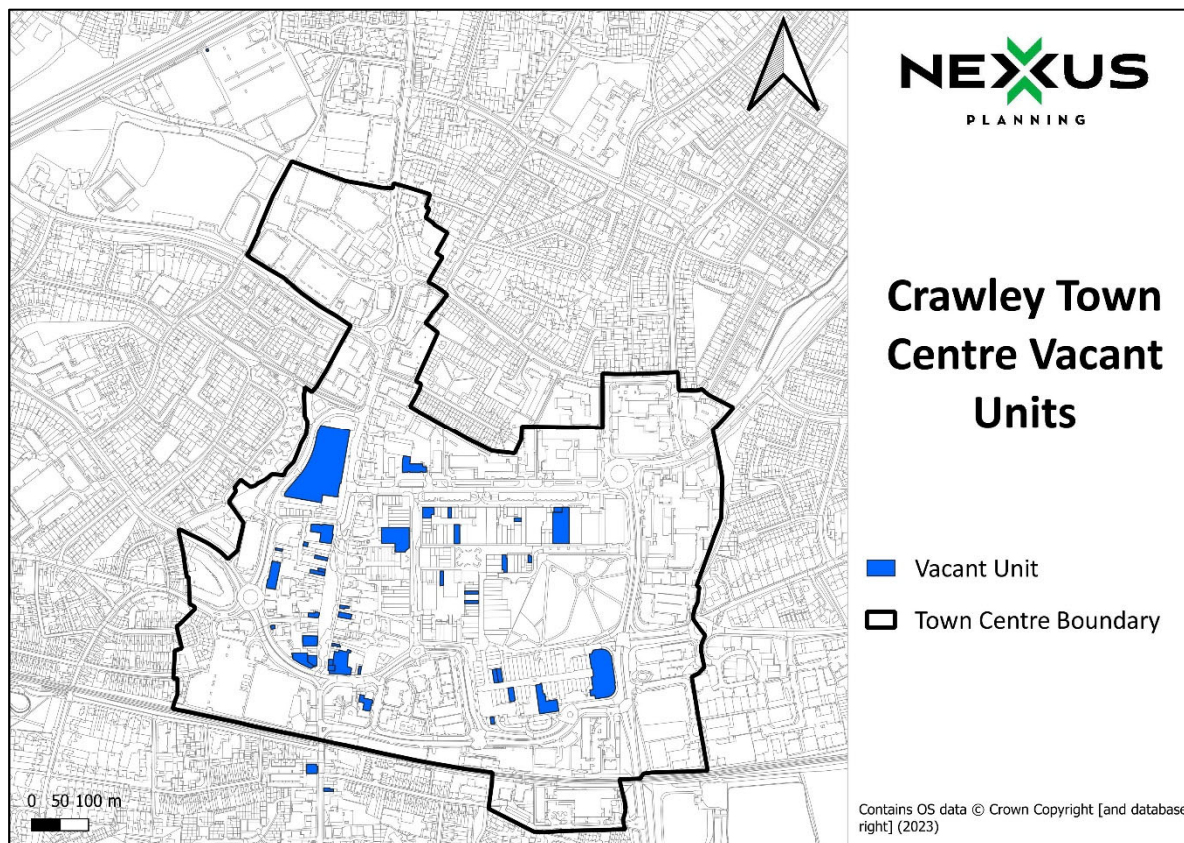
Table 2.7.1 Crawley Town Centre – Composiiton Table (Floorspace)

	Crawley Town Centre September 2022 (%)	National Average September 2022 (%)	Crawley Town Centre May 2019 (%)	National Average May 2019 (%)
Comparison	39.5%	29.9%	41.2%	34.0%
Convenience	11.4%	15.5%	16.4%	15.4%
Services (total)	25.9%	40.2%	33.5%	39.8%
<i>Retail</i>	<i>3.9%</i>	<i>7.3%</i>	<i>3.1%</i>	<i>7.0%</i>
<i>Leisure</i>	<i>16.6%</i>	<i>26.5%</i>	<i>24.5%</i>	<i>25.4%</i>
<i>Financial & Business</i>	<i>5.4%</i>	<i>6.4%</i>	<i>5.9%</i>	<i>7.4%</i>
Miscellaneous	0.0%	0.0%	0.0%	0.1%
Vacant	23.1%	13.8%	8.9%	10.2%

Vacant Units

- 2.8 Table 2.4.1 shows that the number of vacant units in Crawley Town Centre has increased from 43 units in 2019 to 51 units in 2023. This is an increase from 10.8% to 12.5% of all units. This is just below national average.
- 2.9 Table 2.7.1 shows that the proportion of vacant floorspace in Crawley Town Centre has increased significantly between 2019 (9.9%) and 2023 (23.1%). The proportion of vacant floorspace significantly exceeds the national average.
- 2.10 The increase in vacancies includes the former Morrisons and Debenhams stores, as well as a number of other notable units. Figure 2.10.1 below shows that vacancies are spread throughout the centre, though there is a notable concentration on High Street.

Figure 2.10.1 Map showing distribution of vacant units in Crawley



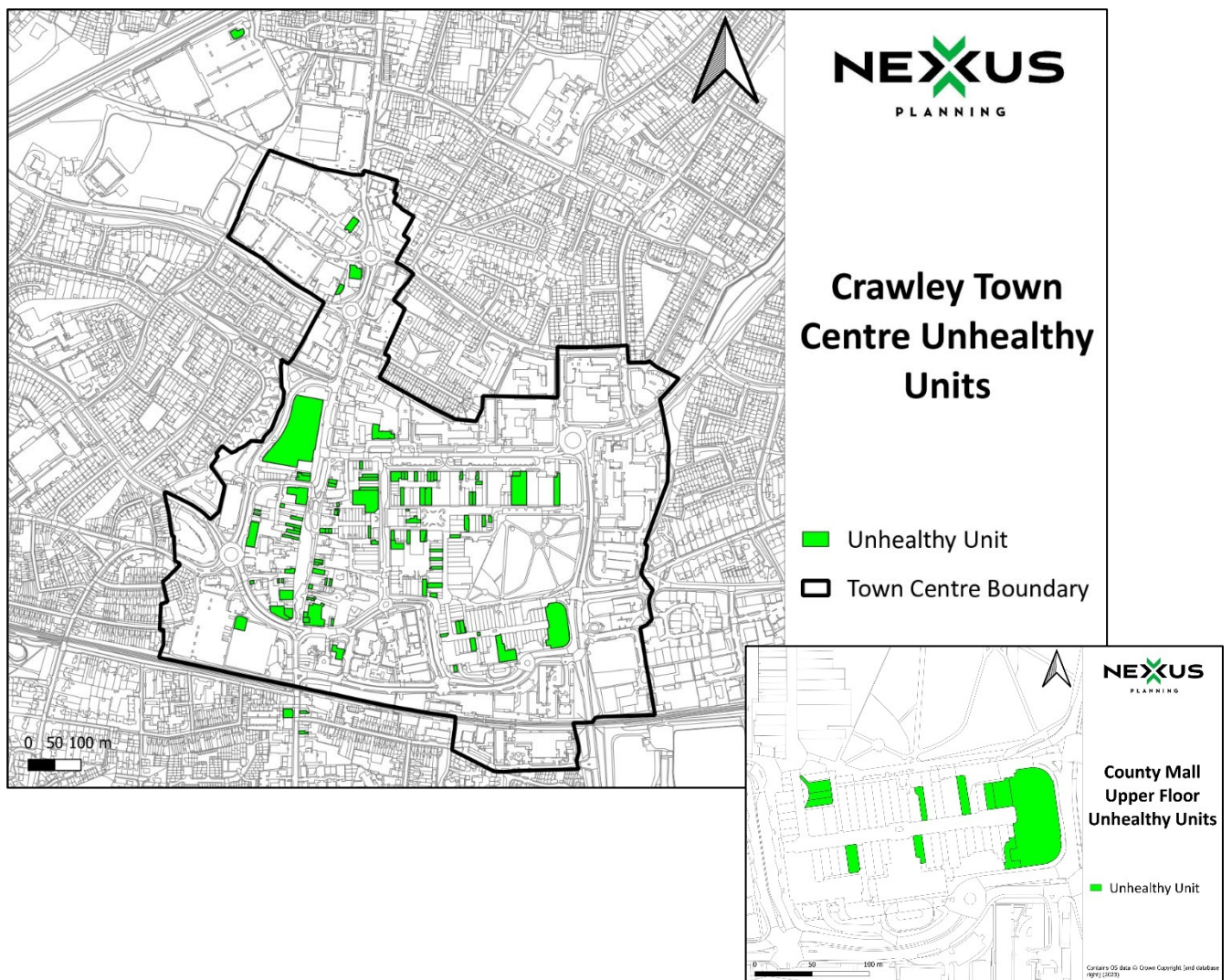
Culture & Leisure

- 2.11 27.3% of units are occupied by leisure services. North of the Town Centre in Crawley Leisure Park, there is a high concentration of leisure uses, where visitors can find Cineworld, Hollywood Bowl, indoor mini golf at Caddies Crawley, along with a number of chain restaurants such as Five Guys, Wagamama and Nandos. The leisure park has a large surface car park comprising 1006 spaces and is free with a maximum stay of 2 hours.
- 2.12 When compared to the national average of leisure uses, an above average number of units are occupied by leisure services. The previous 2019 retail study anticipated for the proportion of leisure services in the town to grow in line with observed trends. Whilst there has been a slight growth, this sector of the centre has not grown as much as anticipated. Despite the local population growing, the impacts of Covid undoubtedly had an impact on the opening of leisure services.

Unhealthy Businesses

- 2.13 26.3% of businesses in Crawley are considered to be unhealthy, i.e. that these uses are indicators of a town centre that is more vulnerable in terms of its vitality and viability. A majority of the unhealthy businesses in the centre are either fast food, take away or vacant units.

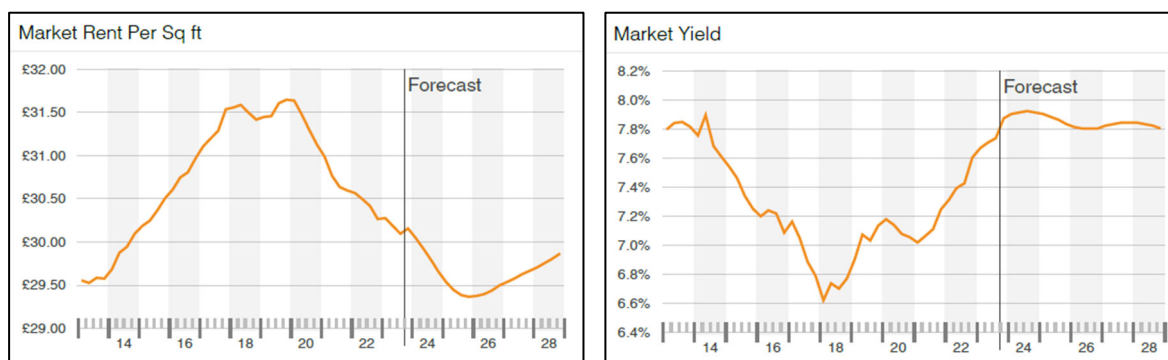
Figure 2.13.1 Maps showing distribution of unhealthy businesses in Crawley



Business Confidence

- 2.14 In November 2023, CoStar shows that Market Rent per sq/ft in Crawley Town Centre is currently averaging £30.15 and Market Yield is 7.8%.
- 2.15 As with many centres, the Covid-19 pandemic had a significant impact on business confidence, with sharp negative movements on both metrics (i.e. decreasing rent and increasing yield) shown between 2020/23.

Figure 2.15.1 Market Rent and Market Yield of Crawley Town Centre



Partnership Working

- 2.16 Crawley Town Centre Business Improvement District (BID) was formed in 2019. It will run over the period 2020 to 2025, and over its term, will deliver a range of projects and initiatives aligned with the primary values to make the Town Centre safer and more vibrant, supporting greater connectivity between businesses and promoting the Town Centre more widely.
- 2.17 The Safer Crawley Partnership has a number of representatives from the local council to the local police force, with the partnership having a statutory duty to reduce crime and disorder. The partnership is also supported by the voluntary, community and business sector.
- 2.18 Crawley Borough Council frequently run community engagement events such as a planting event where nearly 500 trees were planted at Tilgate Park and the Neighbourhood Improvement Fund where money that has been collected from developers through the planning system is allocated to neighbourhood improvement projects.

Events

- 2.19 Council run events include a Festive Fayre and Children's Business Fair, with private events including Oktoberfest and Crawley Pride. The Town Centre BID run events throughout the year, generating interest and footfall and showcasing the town centre as a place to visit.

Access

- 2.20 Crawley Train Station is located in the town centre and has half hourly services running through it to London Victoria and Peterborough via London Bridge. Half hourly services also run to Bognor Regis, Portsmouth & Southsea and Southampton Central. Three Bridges Train Station is located just over a mile out of the centre. Services from Crawley Train Station stop there, and travellers can catch further services to Cambridge and Brighton.

- 2.21 There is a large area along The Broadway where fifteen different bus routes stop. These bus routes provide local services, as well as services to Gatwick Airport, Redhill, Caterham and Worthing. The Broadway is centrally located in Crawley, meaning that the centre is highly accessible by bus. There are also a high number of bus stops around the centres periphery.
- 2.22 There is a large residential built-up area around Crawley, which means that the centre is largely accessible by foot. However, to the south of the centre, there is a barrier to pedestrian movement caused by the railway line and a level crossing which means at times pedestrian movement would be restricted. Around the centre, there are wide pavements, and large pedestrianised areas that will encourage pedestrian movement, however it would be beneficial if there were more pedestrian crossings as the roads were observed to be busy at the time of visiting.
- 2.23 Cycle lanes were not frequently observed, however they were noticed along The Boulevard. The introduction of more cycle lanes would be a beneficial improvement for the centre.

Environmental Quality

- 2.24 Within Crawley Town Centre, is the large Memorial Gardens, located on the corner of College Road and Queensway. The gardens have a high number of benches, along with footpaths and green spaces, creating an attractive environment for visitors.
- 2.25 Just outside of the town centre is Southgate Park which is a large open green space, which also has a cricket club, tennis courts and a skatepark.
- 2.26 Public realm improvements have improved the environmental quality at Queens Square, The Martlets, Eastern Gateway, High Street and The Boulevard. These improvements have seen surface improvements to pedestrian and cycling areas, the planting of trees, creation of planted areas and the introduction of more street furniture such as benches and sculptures.
- 2.27 Along The Pavement, the exterior wall of Marks and Spencer experienced 'Graphic Rewilding' in 2021. Creative Crawley commissioned Baker & Borowski to create a unique Graphic Rewilding mural, bringing colour to some of the vacant units and blank facades.
- 2.28 Around Crawley Town Centre, there was not much litter noticed though graffiti was noticed on the boarding of vacant units.

Figure 2.28.1 Graphic Rewilding along The Pavement



Source: Nexus Site Visit (November 2023)

Car Parking

- 2.29 There are three multi-storey car parks in Crawley that are owned and managed by Crawley Borough Council, who also manage other surface car parks and parking areas (i.e on-street parking).
- 2.30 The 396 space Kingsgate multi-storey car park has a flat-rate of £2.50. Town Hall Multi-storey car park has 558 spaces and costs up to £3.80 for a day, with lower pricing for one and three hour stay. Orchard Street multi-storey car park has 448 spaces and costs up to £5.30 for 12 hours, again with lower pricing for one and three hour stays. Town Hall and Orchard Street car parks both have a flat rate of £2.10 for parking between 6pm-midnight and the weekend.
- 2.31 There is additionally a large multi-storey car park above the former Morrisons Supermarket, along Pegler Way, with 500 spaces. Parking here costs £1.50 for two hours and goes up to £10 for 9 hours.
- 2.32 As such, it can be said that Crawley has a plentiful supply of parking spaces that are at a relatively low cost for visitors.

Historic Environment

- 2.33 Crawley High Street is within a designated Conservation Area, with history there dating back to the Norman Times. Within the High Street Conservation Area, there are a number of listed buildings. Most notable are the Grade II* Listed Old Punchbowl Pub and Grade II* Listed 'The Ancient Priors' which dates back to 1450.
- 2.34 There are four further conservation areas that are located just outside of the town centre boundary.

Street Markets

- 2.35 Crawley Market is located along The Broadway and Haslett Avenue and is held every Wednesday, Friday and Saturday between 9:30am - 4:30pm. Despite the market being small in size, a wide array of goods are available from it such as fresh fruit and vegetables, fresh bread and cakes, comparison goods and fresh meat.
- 2.36 There are occasional speciality markets also held in Crawley, such as the Continental Street Market which was held over 4 days in October 2023 and the Crawley Festive Fayre which is set to be held over 10 days in December 2023.
- 2.37 During Nexus's site visit in November 2023, some market stalls were observed outside of the now vacant Debenhams on the upper floor of County Mall Shopping Centre. The stalls are part of 'The Collective' which is a space where unique and creative businesses can showcase their wares without the commitment and investment of a shop unit. The location of the stalls was a positive use, of what had become redundant space since the closure of Debenhams in 2021 and made the large empty space more welcoming for visitors.

Figure 2.37.1 The Collective, County Mall Shopping Centre, Crawley

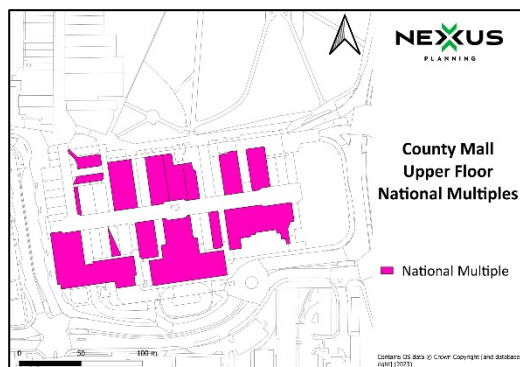


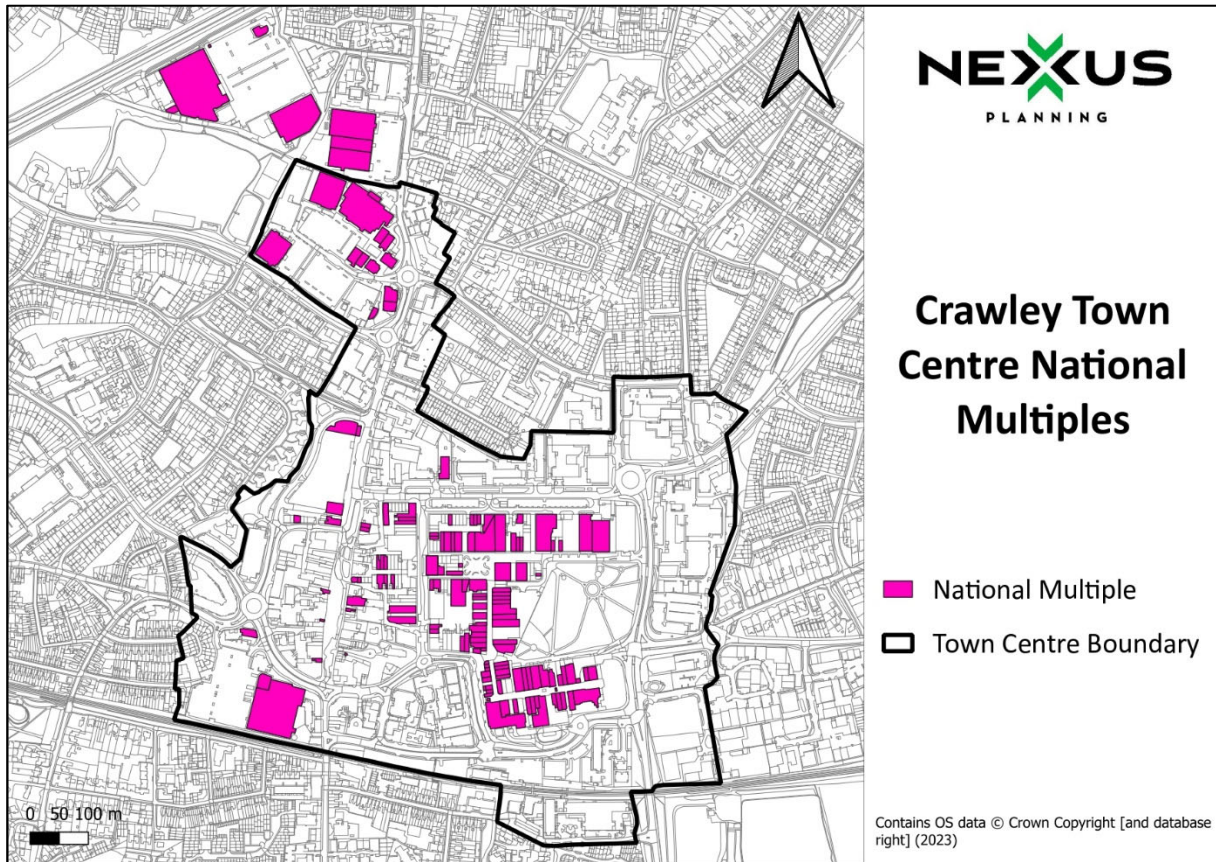
Source: Nexus Site Visit (November 2023)

Independent Trading versus National Multiples

2.38 Our assessment is that 42.3% of the units in the centre are national multiples (defined as having 9 units or more), with the remaining 57.7% in independent occupation.

Figure 2.38.1 Map showing the distribution of national multiples in Crawley

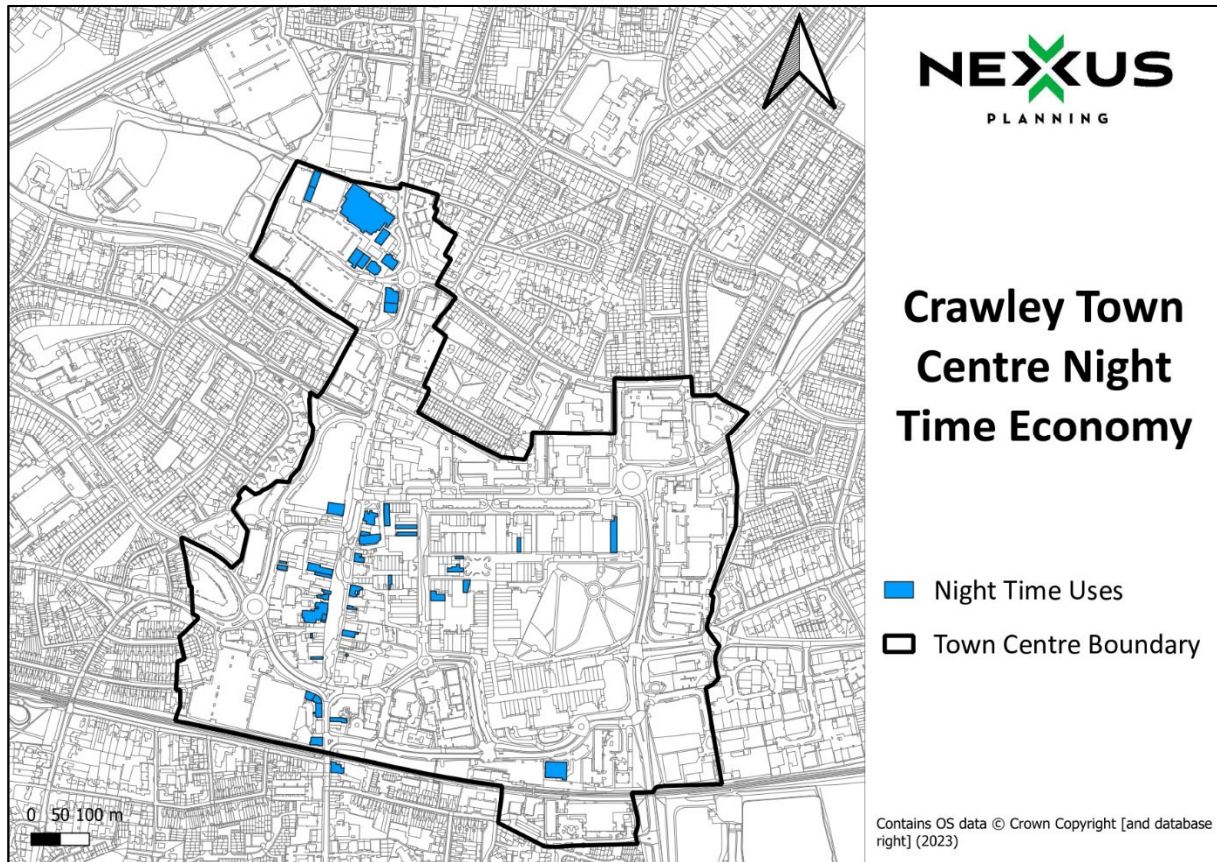




Night-time Economy

- 2.39 The previous 2019 Study identified that the north and west parts of the town centre provided a relatively strong night time economy offer. At the time the night-time economy offer predominantly comprises of restaurants, pubs and bars as well as Cineworld and Hollywood Bowl located within the leisure park.
- 2.40 This is still the case, with 11.3% the centre's units in a use that supports the night-time economy.

Figure 2.40.1 Map showing the distribution of 'night-time' uses in Crawley Town Centre



Public Investment

2.41 There is a significant programme of regeneration and development across Crawley, which the council hopes will help them to achieve their vision in the coming years. In 2020, Crawley was granted £21.1m to help boost job creation, business growth and economic recovery as part of the Towns Fund. Some key developments that have been assisted by the Towns Fund, and previous funding sources include:

- Queens Square – high-quality granite paving, improved lighting, granite seating/planters and a central, decorative water feature.
- Queensway and The Pavement - an extension to the successful regeneration of Queens Square, this £2.2m scheme was completed in November 2019 and included high-quality paving, larger disabled parking bays, new seating, cycle racks, signage and lighting. The scheme opens up the entrance to Memorial Gardens, with landscaping and improved sightlines towards Crawley College and County Mall.
- Crawley Station Gateway – redevelopment of Crawley Station, refurbishment of Overline House to provide 83 dwellings and new retail and business units, along with the development of three additional residential blocks, providing 223 new homes.
- The development of a new fit-for-purpose town hall which opened in March 2023, along with a district heating network, new flats and public realm improvements.

- A £9million Crawley Growth Programme project, led by WSCC, to improve the public space, connectivity and reduce the existing severance in the town centre created by large roads. Works completed in 2022 to implement new cycling and walking infrastructure, soft landscaping to create a pleasant environment and support key development opportunities coming forward at strategic opportunity sites including the Town Hall, County Buildings, Crawley College and Telford Place.

Technological Enhancement

2.42 There are a number of examples of technological enhancement in Crawley. These include:

- Digital bus stands along The Broadway, providing people with live bus times whilst they wait.
- Digital indicators showing the number of available parking spaces at key car parks in the centre.
- CityFibre have extended its full fibre network to include Crawley, bringing gigabit-speed internet to homes, businesses, community spaces and more
- EV charging points have been introduced at various points around the centre.

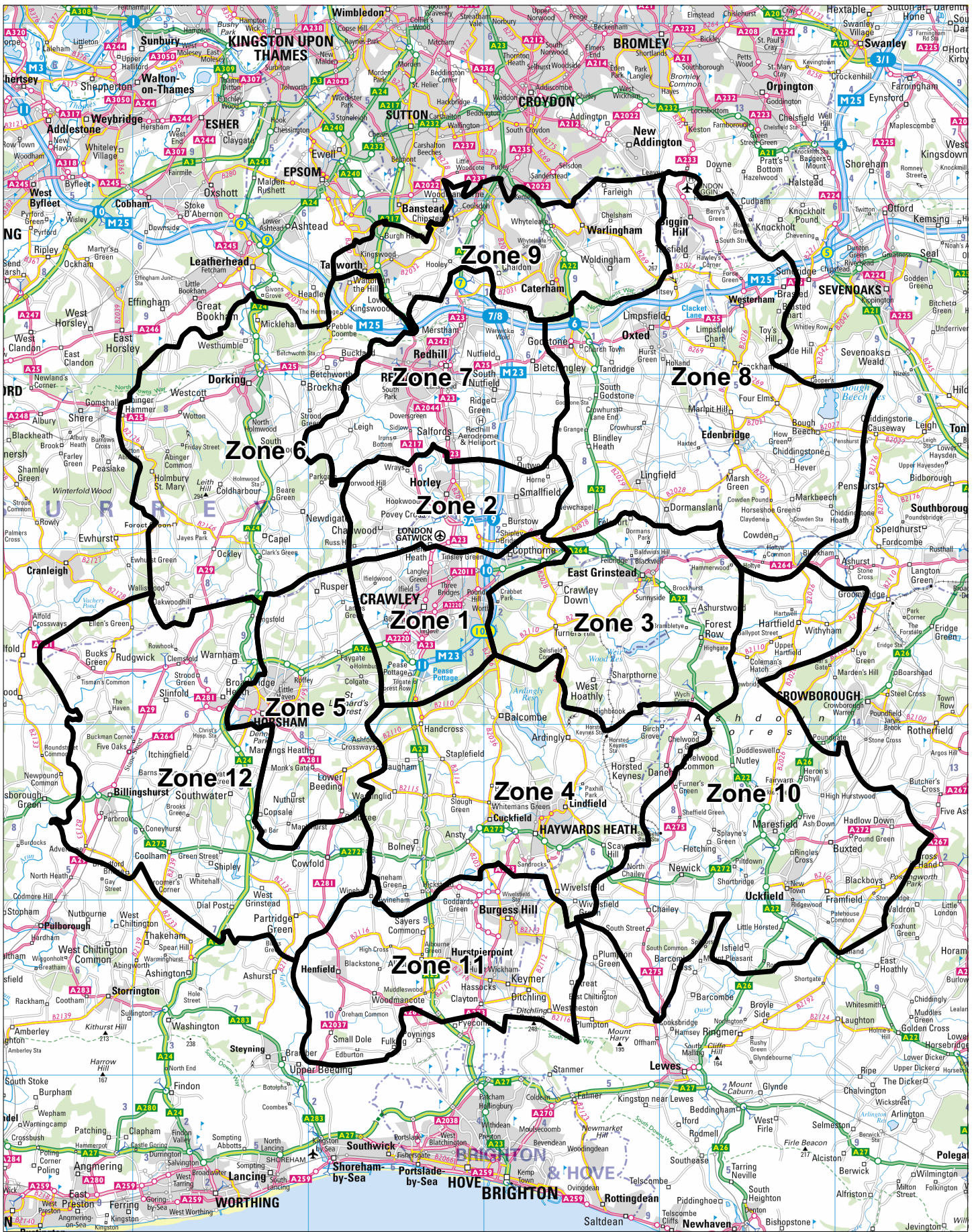
Commercial Demand

2.43 Retailers looking to locate to Crawley Town Centre, according to the Requirements List, are detailed below.

Occupier	Description	Size (min sq m)	Size (max sq m)
Aldi	Supermarket	1,800	2,000
Toolstation	Tools & building supplies	380	600
Itsu	Sushi and hot food takeaway and restaurant	150	400
Wendey's	American burger chain	65	300
David Lloyd Leisure	Health, fitness and racquets group	400	600
Sleep 8	Bed, mattress and sleep technology retailer	200	800
WEX	Camera and photographic equipment retailer	200	400
Poundstretcher	Retail value store	600	3,000
GDK	Donor kebabs, sandwiches and burger restaurant	130	250
Lidl	Supermarket	1,800	260
KFC	Fast food restaurant	120	250
Bensons for beds	Bed retailer	400	800
Bodycare	Health and Beauty Supply Store	200	300
Jump In	Trampoline Park Operator	1,500	4,000
Sunshine Co	Sunbed Chain	100	200
PDSA	Charity Shop	100	300
Slim Chickens	Chicken based restaurant and food to go	220	400
Inkeeper's Lodge	Pub, Restaurant & Hotel	-	-
Miller & Carter	Steakhouse & Grill	300	600
Grape Tree	Health Food Store	125	-

Occupier	Description	Size (min sq m)	Size (max sq m)
The Range	Home, garden and leisure	2,500	4,000
Papa Johns	Pizza delivery and takeaway	100	-
Ember Inns	Comfortable local pubs	-	-
Consol	Tanning Studio	125	350
Dallas Chicken	Fast Food Restaurant	75	125
The White Brasserie Company	Brasserie Restaurant	400	-
Sussex Beds	Bed Retailer	200	500
Machine Mart	Tools & Machinery Equipment	150	800
Taco Bell	Fast-food restaurant	120	250

Appendix B - Study Area Plans



Crawley: Zones 1 - 12



16/08/2010

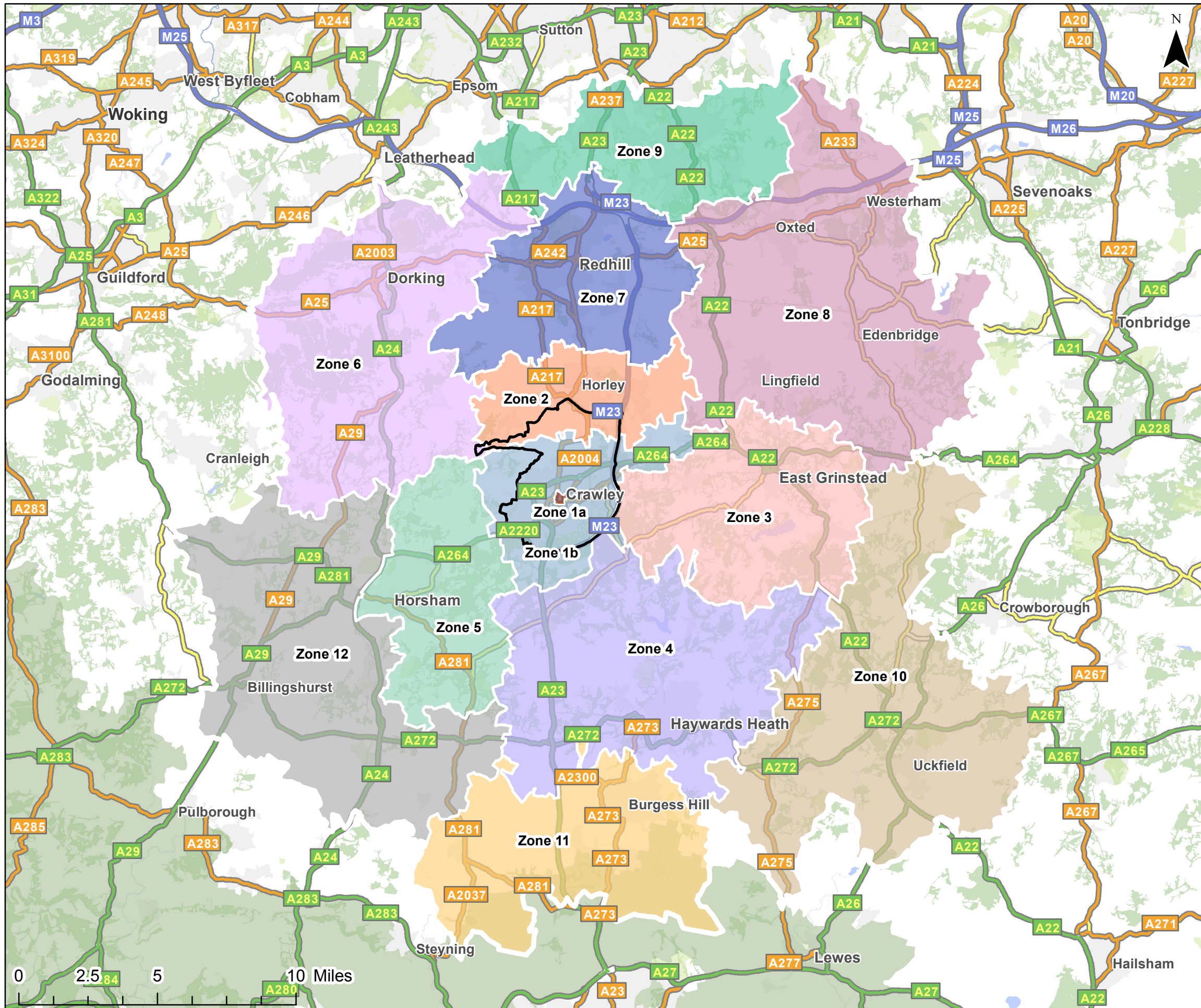


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Minton Place, Victoria Street, Windsor, Berkshire, SL4 1EG
Tel: 01753 848200
Web: www.mapinfo.co.uk

Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment

Study Area



Legend

-  Crawley Borough
-  Zone 1a
-  Zone 1b
-  Zone 2
-  Zone 3
-  Zone 4
-  Zone 5
-  Zone 6
-  Zone 7
-  Zone 8
-  Zone 9
-  Zone 10
-  Zone 11
-  Zone 12

N.B. Study Area Zone definitions adapted from the 'Retail Capacity and Impact Study Update' (2013)



Appendix C - Town Centre Regeneration Programme (2023)

Crawley

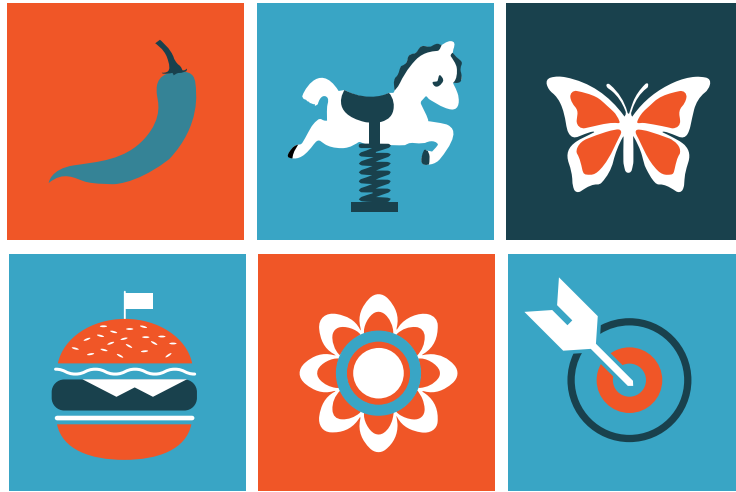


A PLACE TO
GROW



Town Centre Regeneration Programme

March 2023



investcrawley.co.uk

Foreword



Since 2016, Crawley Borough Council and partners have been busy delivering an ambitious, exciting and successful programme to revive and regenerate the town centre – breathing new life into key locations in order to realise the area’s full potential as a fantastic place to visit, live, work and do business.

The programme has seen some major improvements to public spaces including £5.4 million public realm regeneration schemes in Queens Square, the heart of the town centre, and along Queensway and The Pavement.

Crawley’s economy has been badly affected by the Covid-19 pandemic with the majority of town centre businesses forced to close during periods of lockdown and restrictions, a dramatic fall in visitor numbers and the negative impact of furlough and home-working. In response, the council has led efforts

to boost the town centre economy and generate new business investment and jobs by continuing to lead and facilitate the development of major programmes of new infrastructure, amenity and residential development.

In December 2021, Crawley Borough Council published its ‘One Town’ Economic Recovery Plan; an overarching, strategic plan for all our existing delivery programmes including the Town Centre Regeneration Programme. A key priority of the plan is a focus on town centre renewal by enabling a vibrant neighbourhood and sustainable economic future for the town centre via qualitative investment, building on our recent achievements.

A range of major developments have continued to make good progress including construction of a new Town Hall, brand new Grade A business space and high-quality residential accommodation, along with major improvements to public space and transport networks.

Helping to bring our ambitions to fruition is £21.1 million secured from the Towns Fund; this will deliver a number of transformative regeneration schemes (including three with a specific focus in the town centre) that will unlock jobs and boost economic activity. This, in addition to the £15.4 million previously secured from the Coast to Capital Local Enterprise Partnership to deliver the Crawley Growth Programme, is clear evidence of the confidence that exists in Crawley as a place to invest.

At the heart of this programme is our work with stakeholders and the community, ensuring everyone sees the benefit of a regenerated Crawley town centre. There’s something for everyone in our Regeneration Programme – we hope to see you soon!

Councillor Atif Nawaz
Cabinet Member for Planning and
Economic Development

Working in partnership to deliver regeneration



Our ambition for Crawley town centre

To become a dynamic sustainable business growth hub with a bold and vibrant community heart for Crawley and the Gatwick Diamond. This will drive a diverse retail and leisure offer, excellent public realm, high quality town centre living and a thriving evening economy.

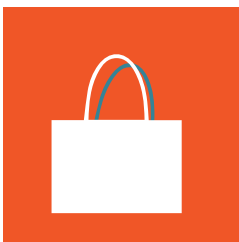
Our objectives

1. Excellent public realm
2. Vibrant community heart for Crawley and the Gatwick Diamond
3. Diverse retail, leisure, culture and business offer
4. High quality, sustainable residential accommodation supported by a rich mix of community facilities
5. Dynamic and sustainable business growth

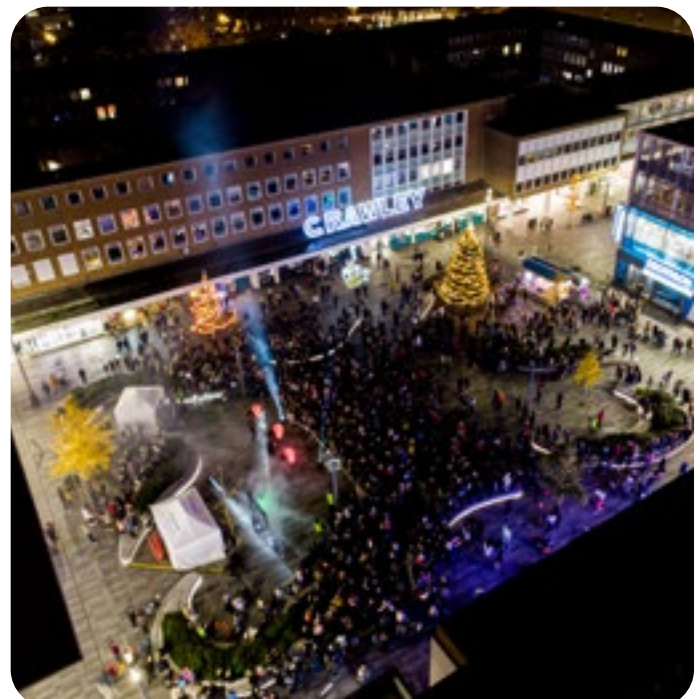
Regeneration in action

Seven key themes will help us transform the town centre and bring our vision to life:

1. Investing in revitalised public realm, highways and infrastructure
2. Bringing forward key town centre opportunity sites
3. Creating the conditions for new high grade business space
4. Developing town centre neighbourhood amenities
5. Governance, engagement and co-ordination
6. Marketing, branding and inward investment
7. Complementary policy



Queens Square



Crawley – a town of opportunities

Crawley already has a thriving business presence and a great retail and leisure offer but it still has a lot more to give. Just some of the existing town centre retailers and businesses include:

Business:

- ASB Law
- ASSI (Air Safety Support International)
- Barrington James
- DMH Stallard
- EMW Law
- Graves Jenkins
- Irwin Mitchell
- Rapidata
- Rapp UK
- RDJW Architects
- Regus
- RSM
- SHW
- Theradex (Europe)
- Travelopia
- Vail Williams

Retail and Leisure:

- B&M Home Store
- Decathlon
- Dunelm
- HMV
- Hotel Chocolat
- iStore
- Longdan Oriental Supermarket
- M&S
- Next
- Pret a Manger
- Primark
- River Island
- Superdry
- TK Maxx
- Turtle Bay
- Wildwood

Along with a diverse retail offer which, despite the huge changes in retailing, continues to evolve, a rapidly increasing number of town centre residential properties have been delivered with many more in the pipeline.

Leisure options are excellent in the town centre with a large leisure park home to top names like Hollywood Bowl, Cineworld and Nuffield Health, along with a wide range of restaurants. Crawley's Historic High Street has a growing cluster of pubs, bars and restaurants.

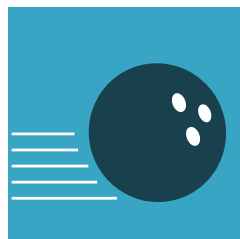
Supporting the vibrancy and neighbourhood facilities is Crawley College, part of the Chichester College group and rated 'Outstanding' by the Office for Standards in Education, Children's Services and Skills (OFSTED). The facility offers education opportunities to thousands of local students each year and in 2021, saw the opening of a new £5million state-of-the-art Science, Technology, Engineering and Maths (STEM) Centre on its campus.

Key strategic opportunity sites include:

- Crawley Station and Car Parks
- Telford Place
- County Buildings
- The Broadway and Cross Keys
- Town Hall (land north of the Boulevard)
- Crawley College
- MOKA, Station Way

There's still room for business to grow and we're looking to create even more space to enable a diverse range of businesses to both start and develop.

Recent years and months have seen a host of successful new openings and moves into the town centre including Five Guys, Dunelm, Wagamama, Barrington James and Tesco Express not to mention a good range of independents.



Progress so far

Thanks to the support of our partners and Crawley Borough Council's commitment to the Town Centre Regeneration Programme, a lot of work has taken place since the first edition was launched in 2016.

Crawley Growth Programme: Working in partnership with West Sussex County Council, successful bids to the Coast to Capital Local Enterprise Partnership for £15.4million helps pay for a number of transformational improvements including public realm and road infrastructure, sustainable transport improvements and business space upgrades. **See page 8** for more information.

Towns Fund: In 2019, Crawley was 1 of 101 places invited to develop Town Deal proposals as part of the Towns Fund. Following submission of a Town Investment Plan in 2020, Crawley was granted £21.1million to help boost job creation, green business growth and economic recovery. **See page 20** for more information.

Queens Square: This £3.2million, award-winning regeneration scheme was completed in 2017 and has attracted £30million private sector investment into the surrounding area. The Square has re-established itself as the heart of the town centre and has become a focal point for events. **See page 8** for more information.

Queensway and The Pavement: Completed in November 2019, this £2.2million project extended the public realm regeneration from Queens Square along key connector streets; Queensway and the Pavement, improving sightlines to Memorial Gardens and Crawley College. **See page 8** for more information.

Station Gateway: Planning permission granted in 2021 for a significant residential-led mixed-use development including a new train station. Funding secured and concept designs prepared for complementary and integrated highways and public realm improvements along Station Way and Friary Way. **See page 8** for more details.

Town Hall: Demolition of existing site and construction of a major mixed-use development including a new town hall, significant residential development and 77,000 square feet of Grade A office space. Phase one completed in 2022. **See page 10** for more details.

District Heat Network: Construction of a new energy centre on the former town hall site to serve new and existing buildings and help reduce energy and carbon emissions for connected local residents. Phase one due completed in 2022. **See page 10** for more details.

Geraint Thomas House: Attractive, modern design for 91 affordable homes on a former public car park site. Completed in 2021. **See page 23** for more details.

Affordable Homes: A number of council-led affordable housing development schemes have been delivered or are under construction in the town centre, providing a sustainable location for people to live and work. Supported by a number of private developments, this recognises that more people are choosing to live and work 'in town'. **See page 23** for details.

Town Centre Business Improvement District (BID): In November 2019, town centre businesses voted in favour of establishing a BID, which will unlock more than £2million of investment over the next five years and help to create a thriving town centre. **See page 18** for more information.

Employment and Skills Programme: Launched to improve the prospects and opportunities for Crawley residents and updated in 2019, this programme of work has seen significant progress including Employ Crawley, a new Youth Employment Support Hub and a Town Centre Skills Academy. **See page 23** for more information.

Signage and wayfinding: New town centre signage has been designed and installed, in line with the place branding design. **See page 20** for more details.

Crawley College STEM Centre – brand new £5million facility, opened in 2021, providing virtual and mixed reality technology and STEM (Science, Technology, Engineering and Maths) facilities. **See page 10** for more information.

Town Centre Professional Services Forum: Forum of professional services companies that meet on a regular basis with the aim of making a demonstrable difference to the town centre's day and night economy and local skills and employment. **See page 18** for details.

Inward investment: New website launched and an inward investment programme developed to promote the wealth of opportunities in the town and attract new investment. **See page 20** for more information.



Investing in revitalised public spaces

Joint partners, Crawley Borough Council (CBC) and West Sussex County Council (WSCC), secured £15.4million of funding from the Coast to Capital Local Enterprise Partnership (LEP), as part of a £73 million public funding investment package. The funding is supporting delivery of the Crawley Growth Programme to deliver a range of public space, sustainable transport infrastructure and highways improvements, alongside property acquisition/refurbishment to boost the supply of modern business space.

Queens Square – 2017: A £3.2million project jointly funded by WSCC and the LEP and delivered by CBC. Construction work to transform the heart of the town centre included high-quality granite paving, greatly improved lighting, granite seating/planters and a central, decorative water feature. The town's bandstand was successfully relocated to Memorial Gardens, creating an attractive new performance space. The project has been a catalyst for wider investment, attracting more than £30million private sector investment in the surrounding properties in the form of new occupiers (including Decathlon, Metrobank and La Rusta), building renovation and store refurbishment.

Queensway and The Pavement – 2019: Delivered through the Crawley Growth Programme, as an extension to the successful regeneration of Queens Square, this £2.2m scheme was completed in November 2019 and included high-quality paving, larger disabled parking bays, new seating, cycle racks, signage and lighting. The scheme opened up the entrance to Memorial Gardens, with sympathetic landscaping and improved sightlines towards Crawley College and County Mall.

Eastern Gateway 2021-2022: An £9million Crawley Growth Programme project, led by WSCC, to improve the public space, connectivity and reduce the existing severance in the town centre created by large roads. Works completed in 2022 to implement new cycling and walking infrastructure, soft landscaping to create a pleasant environment and support key development opportunities coming forward at strategic opportunity sites including the Town Hall, County Buildings, Crawley College and Telford Place.

Station Gateway 2023-2026: Integrated, sustainable access and public realm improvements including the regeneration of Friary Way and the bus station. The £5.4million public space project, funded by the Crawley Growth programme, will see greatly improved cycle and pedestrian access between Crawley train station, bus station, County Mall and The Broadway. Additional funding of £2million from the Towns Fund and £5.3million from the Bus Service Improvement Plan will deliver an enhanced bus station and improve bus and traffic flows, complemented by new soft landscaping and public realm improvements to enhance the living environment in this part of the town centre. This will help to progress a major development on the site itself, led by the Arora Group, including over 300 high-quality, new apartments and the transformation of Overline House to create a new Crawley train station.

Sustainable transport improvements 2023-2025: Funded by the Crawley Growth Programme, the project will support sustainable living in the town centre and improve the environment and living conditions for new residents. Work includes a new and improved bus station in the town centre and the roll out of a new fleet of low emission and hydrogen buses from Metrobus, supported by enhanced bus routes.

Improving walking and cycling 2022-2024: WSCC and CBC have identified key cycle route improvement priorities in the town centre, supported by the Crawley Transport Strategy 'New Directions'. £1.1m drawn down from the Crawley Growth Programme will help to improve connectivity by removing physical barriers and creating better spaces for walking and cycling. The scheme will focus on the western end of The Boulevard and deliver improved, sustainable transport facilities, completing the link from The Boulevard to existing cycle infrastructure in the High Street.

The Broadway and Cross Keys – undetermined: There is potential for public space improvements to complement new build residential development and retail space and align with other developable sites coming forward in the area. Drawing on other public funding sources may also be an option here.

Queensway



Station gateway (visual)



Eastern gateway



Opportunity sites – seizing the moment

There are a number of key town centre sites either in the pipeline or providing opportunities not yet taken up. As town centre living continues to grow and to meet the demand for modern, town centre business space, all such sites are for mixed use.

Station Gateway: The Arora Group, in partnership with Network Rail, CBC, WSCC and Govia Thameslink Railway, is to transform the existing railway station site. This will include the complete refurbishment and extension of Overline House, providing 81 apartments, with two additional floors and ground level business/retail units. Three additional new blocks comprising 223 apartments will be built to the west of Overline House. Planning permission granted April 2021.

Town Hall: 2019-2024 Crawley Borough Council and developers Westrock have commenced construction of a £150million major mixed-use, phased regeneration scheme that includes The Create Building; a new, nine storey energy efficient building comprising a new Town Hall and 77,000 square feet Grade-A office space, adjacent to 273 new apartments, including 109 affordable homes, a new public square, new commercial units and infrastructure for a district heat network. Phase 1 completed in 2022, to be followed by phase 2 in 2023 to 2025.

Crawley College: brand new facility on campus, opened in Spring 2021, is home to a suite of innovative and interactive spaces, containing virtual and mixed reality technology and STEM (Science, Technology, Engineering and Maths) facilities which put the college at the cutting edge of training delivery across a range of subjects. The £5m centre was funded by the Coast to Capital Local Enterprise Partnership; recognising the skills needs of local employers in the Gatwick Diamond. This is the first phase of development for a wider masterplan covering the whole campus, which will allow the release of some land in the north of the College site to be released for residential-led mixed-use development.

Telford Place: Crawley Borough Council is working in partnership to bring forward a mixed-use, residential led scheme on this site. The scheme will deliver approximately 300 new homes as part of the regeneration of Crawley town centre. The site, previously used as a temporary car park, will provide a variety of tenures. A planning application is expected in 2023.

County Buildings: Crawley Borough Council is working closely with owners WSCC, through the One Public Estate Partnership, to find partners with the aim of delivering a mixed-use development at this key town centre site. It is a prime location for high-grade commercial and residential use, offering another exciting opportunity for a major town centre regeneration scheme.

The Broadway and Cross Keys: The planning vision is to establish vibrancy in this part of town through the activation of unused areas, increased permeability of footfall flows to the historic High Street and the strengthening of perimeter sites including active edges on all sides of developments. The first phase is complete with 78 new apartments above ground level commercial space delivered at 15 to 29 The Broadway.

Institute of Technology – a successful bid, led by the Chichester College Group to create the Surrey and Sussex Institute of Technology, will deliver a new state-of-the-art centre at Crawley College, housing engineering and digital 'learning factories' to provide new pathways for learners to expand their knowledge and develop valuable skills that are in demand from local employers. Expected to be complete by 2024.

Town Hall (old and new)



New Town Hall



Crawley Growth Programme – Crawley town centre



275 homes
77,000 square metres grade A office space
District heat network
Improved public realm
New public square
Commercial units

Town Hall
Phase one completed 2022
Phase two (residential) 2023 to 2025

Mixed-use development opportunity site including 5,500 square metres office space

County Buildings

- Other improvements**
- Real time passenger information
 - New bus shelters and bus infrastructure investment
 - Walking and cycling infrastructure improvements

- Queensway (completed October 2019)**
- Continuation of high-quality improvements in Queens Square along main connector streets
 - Improved connectivity with Memorial Gardens and Queensway
 - Flat, accessible and attractive space
 - Attractive lighting for safety and aesthetics
 - New seating and cycle racks



Queens Square

Crawley College building

- Eastern Gateway (completed 2022)**
- Public realm upgrades to transform the living environment
 - New cycle routes
 - Upgraded pavements
 - Raised highway tables and new toucan crossings to improve pedestrian and cyclist connectivity between town centre core and regeneration sites

- Station Gateway**
- Public realm upgrades to transform the living environment
 - Enhanced bus station and improved bus infrastructure including new shelters
 - Existing shelters repositioned to increase space for pedestrians
 - Highway changes to improve pedestrian space and crossings
 - Shared space footways
 - Changes to improve visibility and attractiveness of the environment
 - Low level planting to improve views and linkages to the train station
 - Tree planting to soften the vehicle dominated environment

Station Gateway

Existing station transformed, a new plaza entrance and surface car parking
304 new residential apartments with car parking facility and cycle storage
Facilities for a start-up business

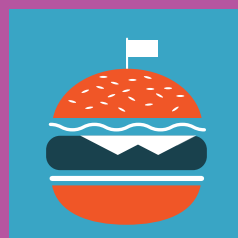
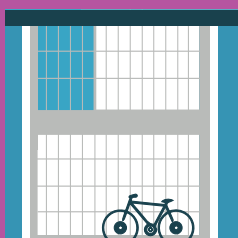
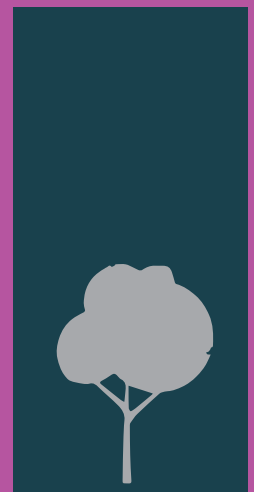
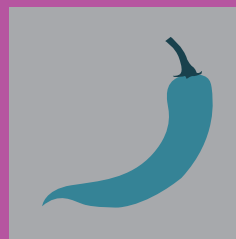
Telford Place

Up to 300 homes
370 square metres of commercial space



Great space for business

- **Town Centre Commercial Space and Business Networking Hubs:** Working with stakeholders, we aim to provide prominent venues for businesses and local entrepreneurs to hot-desk, co-work, meet and to do business. Their locations will maximise usage by micro-enterprises and business people on the move. Funded by the Crawley Growth Programme, a priority project will see regeneration of the former Queensway stores (at the corner of Queens Square and Queensway) to deliver high-quality, flexible business space on the upper floors. A planning application is expected in 2023. Other suitable sites will continue to be considered/encouraged for similar use.
- **Commercial Eastern Gateway masterplan:** Funding from the Towns Fund will be used to produce a comprehensive delivery plan for the build out of further phases of new commercial space at the eastern gateway to the town centre, retaining and enhancing the town centre's professional services employment base, building on momentum generated by the new Create Building.
- **Live-work space:** Aiming to attract professionals keen to access office space close to home in order to reduce costs and improve work/life balance.
- **Delivering new commercial space** – the new Create Building has delivered 77,000 square feet of Grade A commercial space over five floors that will seek to attract companies from the professional services business sector looking to trade from high quality premises in Crawley town centre. The energy efficient building has excellent natural light and benefits from LG7 LED lighting with gigabit superfast broadband available throughout.
- **Upgrading existing commercial space:** Creating and improving relationships with property owners is encouraging building upgrades and refurbishment, e.g. high quality, residential conversion at 1 to 3 Queens Square and the Boulevard. Enforcement powers will be considered where properties are of a poor quality and owners are not willing to make the necessary improvements.





Crawley Campus



Supporting a town centre neighbourhood

As the way we live continues to change and the need increases to find more space for housing while reducing our impact on the environment, town centres can provide an excellent solution for a more sustainable living environment. Crawley town centre will encompass good quality living, a wealth of facilities, amenities, jobs and excellent sustainable transport options which will encourage modal shift and reduce congestion. Sustainable developments are required within the town centre which are defined as 'development that meets the social, economic and environmental needs of the present without compromising the needs of the future.'

- **Employ Crawley:** A flagship project within Crawley Borough Council's Employment and Skills Programme, Employ Crawley launched in 2017 and has been hugely successful in supporting hundreds of local residents on their journey into work. Delivered in collaboration with Jobcentre Plus, West Sussex County Council and a range of partners, the service secured additional funding in 2020 to provide a dedicated Youth Employment Support Hub – directly in response to the impact of the pandemic on local young people. **See page 23** for more information.
- **Memorial Gardens:** Ensure this flagship town centre park is used to its full potential. This has been assisted by the redevelopment of Queens Square and Queensway which opened up the entrance of the park, relocated the bandstand into a prominent location in the gardens and improved sightlines to Crawley College and County Mall. A new and improved children's play area in the gardens, including accessible play equipment and a wheelchair swing, opened to the public in 2020.
- **A new Cultural Quarter:** Funding from the Towns Fund will be used to design a new cultural quarter in the town centre, identifying locations for new cultural and events venues, set up a programme of pop-up arts and cultural events and unlock new cultural amenities as key assets for a vibrant town centre neighbourhood.
- **Crawley market:** Crawley's existing market is located along the Broadway and Haslett Avenue West every Wednesday, Friday and Saturday from 9.30am to 4.30pm. The recent regeneration of Queensway includes specifically designed space to enable a quality market to grow and thrive.
- **Crawley Museum:** A combination of Heritage Lottery fund and Crawley Borough Council capital programme funds enabled the conversion of The Tree, one of the oldest buildings in the town centre into Crawley's museum.
- **GP Surgery/NHS Clinic/dentist services:** As the volume of residential accommodation grows in the town centre, the demand for GP Surgery and NHS dentist services is likely to grow. Officers are reviewing these services with health sector colleagues to determine if additional provision is required, both as amenities for the new neighbourhood and to attract footfall.
- **Town Centre Skills Academy:** In 2019, the council was awarded Skills Academy status by the Construction Industry Training Board (CITB) for existing and forthcoming construction sites in the town centre. **See page 23** for more information
- **Improving public toilet provision:** Along with reviewing existing provision to ensure modern facilities are provided in the right location, the new Town Hall will provide fully accessible public toilet facilities during opening hours, including a new adult Changing Place facility, similar to the one that opened in County Mall in 2017. These innovative facilities include hoist assistance and an adult sized changing bench to provide a safe, hygienic and dignified experience for people with disabilities.
- **Town Centre maintenance and cleaning:** The council will provide a robust and responsive town centre maintenance and cleaning programme to ensure the quality of public spaces is kept to a high standard.
- **Health, safety and wellbeing:** Crawley Borough Council and its partners are striving to create a town centre which is safe and has a positive impact on the health and wellbeing of residents and visitors. This includes investing in culture, public art and performance; working with partners to address health inequalities, deliver safe and healthy homes and working with food retailers and caterers to promote healthy, safe food through schemes like Eat Out Eat Well.
- **Bridgefield House:** Purchased by Crawley Borough Council in 2018, the site has been developed to provide a part 8/part 6 storey building, comprising 98 affordable flats, with associated parking and landscaping. Completed 2021.

Memorial Gardens play area



Bandstand



Governance, engagement and co-ordination

- **Engagement and partnership with town centre site owners/landlords:** The council is strengthening relationships with town centre site owners and landlords in order to work together to attract new businesses, to develop a common vision for town centre regeneration and to establish co-operation and partnership in regeneration delivery.
- **Independent retailers support:** Enable independent retailers to have a strong voice within town centre plans and help them take part in its delivery. Support them to access services which strengthen business including bespoke training and small business grant schemes.
- **Town Centre Business Improvement District (BID)** – A new Town Centre BID was established in 2020, following a successful ballot in which 68% of eligible businesses voted in favour. In excess of £2.25million will be invested into the BID area over the next five years, delivering a range of projects and initiatives designed to make the town centre safer and more vibrant, where businesses feel more connected and where the offer is widely promoted and showcased. The funds will be spent on priority initiatives as set out in the Town Centre BID Business Plan. More information can be found at crawleytowncentrebid.co.uk
- **Town Centre Professional Services Business Forum:** this forum includes representatives from town centre banks, law and accountancy firms, commercial agents, architects and Crawley College. Regular meetings are held with the aim of making a demonstrable difference to the centre's day and night economies, and local skills and employment, complementing and supporting objectives outlined in both the Town Centre Regeneration Programme and the Employment and Skills Programme.
- **Strengthen links between the town centre and Manor Royal:** Explore and define how town centre stakeholders, through the Town Centre BID, should co-operate more closely with the Manor Royal BID. Strengthen business and commercial links between the town centre and Manor Royal.
- **Diverted Giving** – the council is proactively working with key partners, including Crawley Open House, Greater Change, Sussex Police and the Safer Crawley Partnership to support local businesses and the street homeless community. This includes an increased presence of Community Wardens and outreach workers, responsive street cleansing, education and the use of new technology to promote and enable 'responsible giving' by the public.





Marketing, branding and inward investment

- **Towns Fund** – In 2019, Crawley was 1 of 101 places invited to develop Town Deal proposals as part of the Towns Fund. Following submission of a Town Investment Plan in 2020, Crawley was granted £21.1 million to help boost job creation, business growth and economic recovery. Guided by the Town Deal Board, the Council is working with partners to deliver ten priority projects, including a new commercial eastern gateway plan for the town centre, a transformed bus station and sustainable transport interchange and a new cultural quarter in the town centre. More information can be found at investcrawley.co.uk/partners/towns-fund
- **Vibrant town centre events programme:** Help to create a clear identity and character for the town centre whilst generating footfall and promoting a positive reputation through a high-quality programme of events. The Council supports a year round programme of seasonal events that benefit the town centre including Run Gatwick, Crawley Pride, Armed Forces Day and Crawley Festival. The programme is being expanded in partnership with stakeholders including the Town Centre BID, Professional Services Forum, Arts Council, retailers and other businesses. 2022 saw a special programme of events celebrating the town's 75th anniversary. The council takes its lead from an internal events team and dedicated Events Officer.
- **Strong town centre place branding:** A strong, dynamic and honest place brand has been developed for Crawley town centre through partnership work and research with stakeholders. The brand, which aims to help create a positive image and attract more footfall, business and resident pride, can be seen on town centre signage, hoardings around key development sites and the inward investment programme.
- **High quality signage and wayfinding:** Monoliths and finger posts have been installed across the town centre, underpinned by a wayfinding strategy to encourage visitors to explore and navigate the main character areas. Additional signage was installed from 2021 to 2022, including a new Conservation Area sign in the Historic High Street.
- **Inward Investment Programme:** The council is working with key partners to deliver an innovative inward investment programme, designed to showcase the growing business investment in Crawley and the wealth of development and occupier opportunities in the town. The programme includes regular business newsletters, marketing materials, Investor Tours and a programme of targeted events e.g. business breakfasts, participation at Real Estate Live.
- **Invest Crawley website:** the council has developed a regeneration website to promote the physical, economic and community regeneration of the town. The site, which features the place branding, includes an interactive development map, highlighting key opportunity sites to potential investors and occupiers. Visit investcrawley.co.uk for regular updates on Town Centre Regeneration Programme projects.
- **Arts and Culture** – Working in partnership with Creative Crawley and other stakeholders to deliver a three year programme of creativity in Crawley. The project, headed by £1 million investment from Arts Council England, will support local people to engage in high quality arts and cultural activities, attracting further investment and footfall to the area. It will provide a benchmark for delivering Crawley's innovative regeneration plans using arts and culture as a catalyst for social and economic change.

Crawley Library



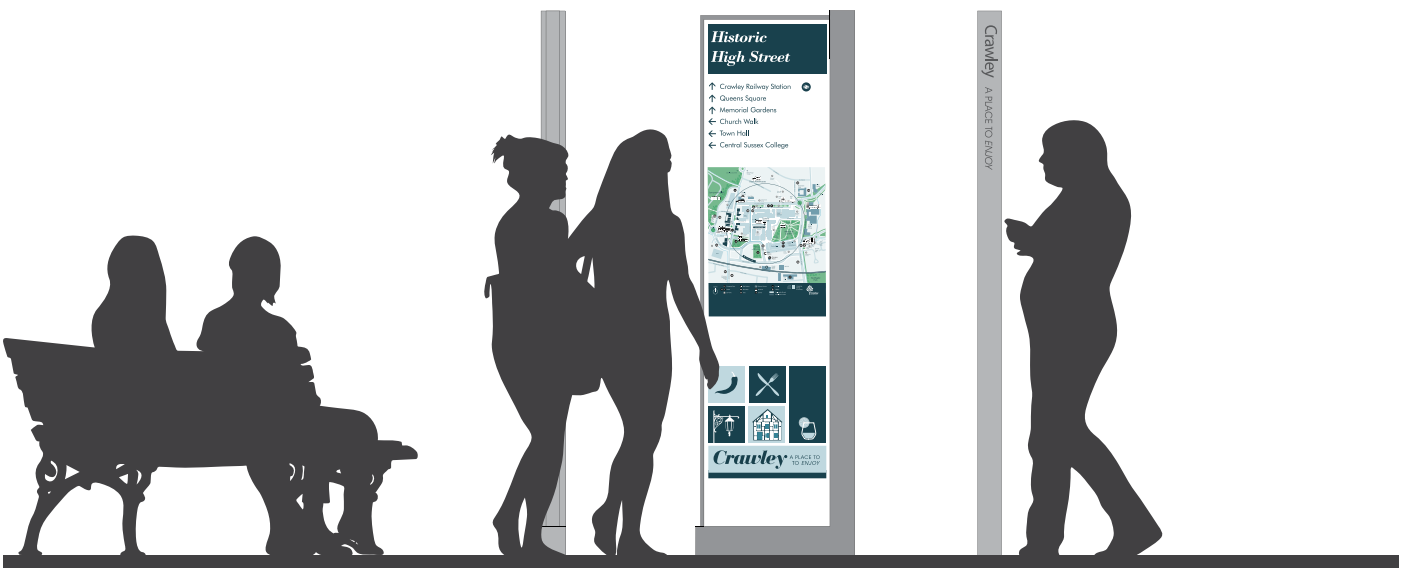
Monolith High Street



County Mall



Wayfinding monoliths (visual)



Crawley

A PLACE TO INSPIRE

Complementary policy

- **The Crawley Local Plan 2015 and emerging 2022 to 2037 Local Plan:** The council has developed clear planning policy and guidance to enable the sustainable regeneration of the town centre through Crawley's Local Plan which is being refreshed for the period 2022 to 2037.

The emerging Local Plan highlights the town centre as an economic centre of Crawley and a key component of Crawley's economic role in the sub-region, stating that "redeveloping and revitalising the town centre...will reinforce the status of Crawley as the place to do business in the south east. The revitalised town centre will be the heart of the town, providing a central point for local people and others from across the region to enjoy social activities, shopping, culture and entertainment both during the day and at night. It will have a welcoming and attractive family-friendly environment. The town centre will become a business growth hub and a recognised neighbourhood with local facilities supporting its residents."

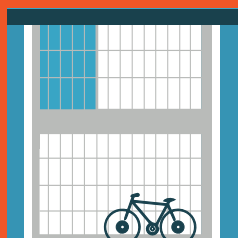
Over 2,000 residential dwellings are set to come forward within the town centre during the Plan period and with a growing residential population, the "town centre is increasingly becoming a neighbourhood in its own right, requiring supporting facilities and services required to meet the needs of people that live there". The relevant Local Plan policies for the town centre respond to the need to:

- *Protect the retail core with flexibility to enable a broad range of other uses, where appropriate, capable of diversifying Crawley's offer*
- *Facilitate the development of town centre neighbourhood facilities/amenities*

- *Ensure 'active and engaging frontages' at ground floor level*
- *Promote a 'town centre first' approach to considering proposals for main town centre uses in Crawley, including for hotel and visitor accommodation*
- *Highlight 'key opportunity sites' for mixed use development within the town centre boundary, where development must demonstrate that it "positively contributes to the vitality and viability of Crawley town centre and sustainable economic growth and job creation in the borough"*
- *Promote a vibrant town centre with a successful evening and night-time economy*
- *Support the creative industries and encourage innovation*
- *Managing the balance between commercial and residential uses.*

The appropriate balance of mixed uses across the area is imperative in order to contribute to a vibrant new neighbourhood and a dynamic hive of business and economic activity in the town centre.

The council is committed to formulating complementary policy which allows it to protect the unique character of Crawley's new town architecture, including the historic High Street, and distinctive uniformity, whilst encouraging and enabling high-quality development proposals within the town centre that are in keeping with the surrounding environment.



- **Employment and Skills Programme 2019 to 2024:** The council, in partnership with stakeholders, has developed a clear programme of action to tackle some of the skills issues affecting some Crawley residents. The plan highlights workforce qualification, employment and average salary levels, and identifies priorities for improving workforce skills development and employment
- **Employ Crawley:** A flagship project within the Employment and Skills Programme, Employ Crawley was launched in 2017, expanded in 2020 to provide a Youth Employment Support Hub and has gone from strength to strength with hundreds of local residents assisted on their journey into work and into higher skilled, higher paid employment since it opened. Operating from the Town Hall, Crawley Library and community based locations, Employ Crawley helps local people access a range of free and bespoke support, advice and guidance from specialist organisations in the town, matching local residents to job opportunities and helping employers access a local talent pool. Visit investcrawley.co.uk/employment-and-skills to find out more
- **Town Centre Skills Academy:** In 2019, the council won Skills Academy status for existing and forthcoming construction sites in the town centre, including Kilnmead, the new Town Hall and the Crawley College STEM Centre. Skills academy status is granted by the Construction Industry Training Board (CITB) if there is a commitment from site developers, working with the College, Jobcentre Plus and the council to maximise the recruitment of local residents into construction site jobs and apprenticeships
- **Climate Emergency 'Action to Zero'** – published in late 2021, the plan sets out how the council will reduce its carbon emissions by at least 50% and as close to net zero as possible by 2030, and reach net zero by 2040 at the very latest. This will be achieved by working in partnership to deliver energy and transport projects including the development of a countywide electric vehicle charging network, delivery of a District Heat Network in the town centre and a range of sustainable transport improvements and working with developers to achieve water neutrality
- **Crawley College Construction Skills Hub** – funding from the Town Fund will deliver a new construction skills hub on the college campus, focusing on delivering green technology skills to support decarbonisation and net zero objectives
- **Affordable housing:** The council is committed to ensuring affordable housing developments are unlocked within the town centre, building on the success of previous schemes including Kilnmead, Bridgefield House and Geraint Thomas House
- **Community safety:** Work with police, Town Centre BID ambassadors, voluntary sector and local agencies to uphold the town centre as a safe and friendly environment with a positive reputation
- **Action through enforcement:** Working with colleagues in the Town Centre BID and other stakeholders, the council will consider taking enforcement action to oblige town centre property owners to tackle and improve poor quality buildings, remove unauthorised development and ensure compliance with planning conditions. This will improve the town centre environment and encourage pride, footfall and investment
- **Transport Strategy** – the council is committed to enabling healthier and more sustainable transport options and is working with partners to deliver a new Transport Strategy, working closely with West Sussex County Council, to improve how we travel around the town and improve the choice of transport options available. New Directions for Crawley' set outs a vision of a walkable town, supported by sustainable public transport, car clubs and safe cycling, using a mix of innovative and integrated transport facilities to serve everyone's needs.

A regeneration plan founded on stakeholders

Achieving this ambitious long-term goal for a vibrant and dynamic town centre can only be achieved through a comprehensive public/private partnership. We will continue to work with town centre stakeholders to make it happen. We

would like to take this opportunity to thank all of our existing town centre partners for their work so far and look forward to creating with them a bright and prosperous future for the town centre.

Working in partnership to deliver regeneration

Working in partnership to deliver regeneration



This is the final draft of the town centre regeneration programme and the council and its partners are keen to gather the thoughts of the wider public and businesses.

To comment or to send in your ideas please email towncentre@ Crawley.gov.uk
Visit investcrawley.co.uk for updates.

“

Crawley Town Centre Business Improvement District is delighted that plans are in progress for the next stage of town centre regeneration. The town centre is the heart of Crawley and we look forward to working closely with Crawley Borough Council and partners to help deliver the Programme.

Maintaining the balance between a small historic new town and a future city is a difficult task however we are confident that this will be accomplished and that businesses and residents will enjoy the benefits.

”

Wendy Bell, Town Centre Business Improvement District Manager.

“

Crawley College is a proud supporter of Crawley Borough Council's continued investment in the town centre. You only have to walk around and to see the positive impact to date on environment and businesses. The College is playing its part in the development plans with our recently opened STEM centre as well as our planned Sussex and Surrey Institute of Technology.

”

Paul Rolfe Associate Principal, Crawley College
(Chichester College Group)





Nexus Planning
London

nexusplanning.co.uk