



Homes  
England

# Crawley Local Plan 2024 -2040 Examination in Public

Matter 9: Environment and Green Infrastructure  
Hearing Statement

Date: December 2023



# Issue 1: Whether the approach to Environmental Protection is justified, effective and consistent with national policy

## 1. Introduction

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

## 2. Is the policy justified in restricting development sensitive to aviation transport noise to the 60dB contour (57db at night)? What has informed the change in thresholds since the 2015 Plan and does Topic Paper 7 provide a cogent explanation?

- 2.1 At the Reg19 stage, the Plan and supporting evidence Topic Paper 7 for aviation noise stated that the Unacceptable Adverse Effect Level (UAEL) is 60dB during the day and 57dB during the night-time. This represented a change in unacceptable noise levels from 66dB in the day and 57dB at night in the adopted Local Plan. Homes England raised concerns that the UAEL proposed to be included within Policy EP4 and the sounds levels proposed to be used by Crawley Borough Council to assess the Significant Observed Adverse Effect Level (SOAEL) and UAEL are significantly lower than those in mainstream use for aviation noise and out of step with national guidance.
- 2.2 As stated in our previous representations, the Local Plan Noise Annexe is clear that the sound levels proposed to be used by Crawley Borough Council to assess the SOAEL and the UAEL are 'locally specific' with reference made in paragraph 4.1.3 of the Noise Annexe to Topic Paper 7: Development and Noise Technical Annex 'Section 6' which sets out a range of evidence to justify draft Policy EP4.
- 2.3 Homes England's view is that Topic Paper 7 does not provide a cogent explanation. As previously stated, within Topic Paper 7, the Council references a single appeal decision to justify an all-out restriction of development within the 60dB contour and it is Homes England's view that reliance on this appeal decision is not sufficient to justify the

proposed UAEL noise threshold within Policy EP4, when considered against the typical mainstream aviation thresholds which have been tested widely.

2.4 Homes England's view therefore remains that unless modified, that the move away from national guidance and mainstream aviation noise to significantly lower thresholds proposed by Crawley, based on locally adopted evidence based levels, for specific circumstances is not justified.

2.5 As suggested previously in our representations, we have recommended a change in the proposed thresholds in Policy EP4 consistent with the typical mainstream aviation noise thresholds, national guidance and standards. A more flexible approach is proposed to allow development where there are sound levels within 60-66dB where suitable mitigation measures can be demonstrated. Furthermore, with that it should identify the SOAEL, rather than UAEL, in the range of 66-69dB to make Policy EP4 become sound and justified.

**3. Would the policy potentially inhibit otherwise sustainable locations for residential development in the Borough?**

3.1 As per our representations, Homes England is of the opinion that Policy EP4 and the consequence of specifying a lower noise threshold for residential development than is implied by national policy/guidance would inhibit otherwise sustainable locations for residential development in the Borough.

3.2 As detailed in our representations, it is possible that a range of suitable mitigation can be built into the proposals via an iterative and holistic process of good acoustic design dependent on the nature and noise exposure of homes. As such, new development has the ability to achieve suitable noise levels in homes within higher noise contours, thereby allowing these areas to come forward for residential development boosting the supply of housing within the Borough.

3.3 Homes England's view therefore remains that unless modified, the proposed noise threshold within Policy EP4 is not positively prepared or effective.

3.4 As noted above, we have suggested previously in our representations a more flexible approach to allow development within 60-66dB where suitable mitigation measures can be demonstrated, furthermore, that it should identify the SOAEL, rather than UAEL, in the range of 66-69dB to make Policy EP4 become sound and justified.

**4. Have alternative thresholds for aviation transport sources been tested including (i) the scope for allowing development within a specified higher dB range subject to**

**demonstrating effective mitigation that would reduce noise levels to acceptable readings in habitable areas; and (ii) not having a dB threshold in policy and so assessing each proposal on its own merits subject to the acoustic evidence and mitigation provided.**

- 4.1 Consistent with our concerns detailed above, there is no evidence at this stage that alternative thresholds for aviation transport sources been tested including (i) the scope for allowing development within a specified higher dB range subject to demonstrating effective mitigation that would reduce noise levels to acceptable readings in habitable areas; and (ii) not having a dB threshold in policy and so assessing each proposal on its own merits subject to the acoustic evidence and mitigation provided.
- 4.2 As noted above, Topic Paper 7 offers a justification of the 60dB level with reference to a single appeal decision for residential development, located close to Manchester Airport's second runway. As such, Homes England's view therefore remains that unless modified, there is no justification for an all-out restriction of development within the 60dB contour. Any such all-out restriction could only be justified in a noise contour aligned with a reasonable UAEL value, which should be in the region of 66-69 dB LAeq,16h'. On this basis, as per our representations, Homes England considers that Policy EP4 is not positively prepared or justified.