

Crawley Borough Council Response to Inspector's Matters, Issues and Questions

February 2015



6.1.1 Policy IN1 sets out the principles towards the provision and protection of infrastructure in the town and provides a policy background to the Infrastructure Plan¹. This sets out an assessment of the provision of infrastructure in Crawley along with the plans of the infrastructure providers and how they are taking into account the impact of development in the town in their future programmes. The Infrastructure Plan was prepared in liaison with the infrastructure providers. The funding of infrastructure improvements depends on the infrastructure in question and whether the provision is on or off site.

6.1.2 The viability work² undertaken by the Council in 2014/15 (the 2014 Viability Study) prepared in support of the CIL charging regime makes some allowance for on-site infrastructure and mitigation. The standard construction rates adopted in the viability assessment based on advice from Gleeds are considered to cover the normal costs of housing construction including on site infrastructure. In the viability update, there is also an allowance of £1,000 per dwelling for site specific S106 costs. The work also indicates what CIL charging levels would be required to ensure that the Local Plan development proposals can be met through a contribution of CIL and other sources.

the “severe detrimental impact” test aims to provide an indication of the level of impact that

6.2.1 The council considers that the provision of adequate water and sewage infrastructure is not a constraint to the level of development proposed in the CBLP, providing that both the council and infrastructure providers continue to work together to ensure that development set out in the Local Plan 2015-30⁴ is supported by the necessary infrastructure in the right place at the right time.

6.2.2 During all stages of the Local Plan process the council has proactively engaged with the water and sewage infrastructure providers to ensure that there are no unknown constraints to development and that there is adequate provision for infrastructure to meet development set out in the Local Plan up to 2030. The borough council has examined the issue of water supply and sewage provision in detail through the preparation of the various stages of the Water Cycling Scoping Study and Update⁵. The outcomes of this work together with jointly agreed position statements with the infrastructure providers is reflected in the Infrastructure Plan.

6.2.3 As part of this process all Infrastructure providers within Crawley were asked in August 2014 to provide a statement on the latest position. The responses of Southern Water and Thames Water are included as (Appendix A).

6.2.4 Southern Water's response to the letter sent in August explains that the

between AMP7 (2020-2025) and AMP8 (2025-2030). Further discussions will take place with Thames Water to ensure that capacity is provided beyond 2021.

- 6.2.7 Both Southern Water and Thames Water have a statutory duty to serve new development and both are committed to providing the right infrastructure in the right place at the right time in collaboration with developers. Developers are required to demonstrate that there is adequate capacity both on and off site to serve a new development and that this will not lead to problems for existing users. However, it is acknowledged that the Local Plan has a role to play in ensuring that the appropriate infrastructure is delivered.
- 6.2.8 The council has and will continue to work closely with water and sewage providers to ensure that the timing of development is co-ordinated with the provision of necessary infrastructure. A number of issues do need to be monitored including a potential need for new sewage infrastructure towards the end of the Plan period. However, this is acknowledged in the Local Plan and is not considered to be a constraint to the level of development proposed in the CBLP, because of the timescales involved, a solution will be in place; possibilities exist to expand the Sewage Treatment Works, and will need to be reflected in Thames Water's future plans take into account the latest technology and information available at that time.

- 6.3.1 A transport evidence base study⁷ of Crawley has been undertaken to examine the impacts of proposed allocations in the Local Plan and to develop an appropriate and proportional transport strategy to effectively mitigate these impacts in compliance with the NPPF⁸. The study considered a combination of infrastructure and non-infrastructure measures for sustainable transport modes and highway junction capacity. The study took place in two stages and was commissioned by Crawley Borough Council (CBC) with West Sussex County Council (WSCC) acting as technical advisor and providing use of transport models.
- 6.3.2 The first stage concentrated on the impact of different levels of assumed growth in housing and employment across Crawley borough without considering site specific locations. The purpose of this approach was to inform CBC on the broad implications of different levels of growth and the extent of additional congestion which would need to be addressed. This stage of the study used the West Sussex County Transport Model (WSCTM), a strategic model representing the main roads and inter-urban public transport routes.
- 6.3.3 The second stage of the study considered site specific development locations using a preferred strategy and an alternative strategy for which sites should be taken forward. These strategies drew on the results of the Stage 1 study as well as other evidence assembled by CBC on other topic areas.
- 6.3.4 For the Stage 2 study, WSCC, CBC and their transport consultant, Amey, agreed that a more detailed transport model was needed than that used for the Stage 1 study, but that it was appropriate to extend the study area beyond the boundaries of the County Council's existing Crawley Transport Model (CTM). Accordingly, Amey developed a hybrid model for the study placing the detailed CTM network for Crawley and Gatwick within the strategic WSCTM framework. The model covers a wide study area and examines the urban area in greater detail proportionate to the transport impacts from proposed development.
- 6.3.5 The hybrid model has been calibrated and validated to acceptable standards against DMRB criteria, to provide a level of accuracy in traffic assignment and simulation appropriate for plan making. This enabled wider impacts of the development strategies to be considered but, due to the WSCTM covering the AM peak hour only, resulted in the study only modelling directly the AM peak. WSCC considers that, although there are some differences in journey purpose proportions between the two peaks, the overall levels of traffic demand in Crawley and the surrounding area

the correct locations and level of infrastructure and other transport provision, which would be required for the development strategies examined.

- 6.3.6 In consultation with the Highways Agency, further work has been undertaken by Amey for CBC to examine PM peak traffic patterns and impacts at key junctions where infrastructure improvement proposals will need to reflect tidal demands in both peaks. The purpose of this work has been to increase the level of assurance regarding the performance and deliverability of the outline designs of transport mitigation schemes. Further work on refining the designs of such measures will be required from developers in support of planning applications as sites currently proposed for allocation are taken forward. However, whilst retaining compliance with the NPPF criteria, this should not change the scope or level of cost of infrastructure and support required to an extent where the viability and deliverability of development are affected. See Appendix B for the recent correspondence between Amey Consulting and the Highways Agency in relation to the emerging outcomes of this additional modelling.
- 6.3.7 WSCC considers that the transport evidence base from the Local Plan studies and addendum work should provide confidence that the identified transport strategy will effectively mitigate the forecast net additional transport demands from the submitted development plan, whilst ensuring that NPPF criteria are met.
- 6.3.8 The transport modelling work⁹ identifies five road junctions which require improvement as a result of the development proposed in the Local Plan. Indicative proposals are provided of the nature of the improvements which would be required to mitigate the impact. The improvements required are amendments to existing junctions rather than the construction of new junctions. The C2C Local Economic Partnership Local Transport Board has allocated £18 million towards transport improvements in Crawley. This, together with the anticipated revenue from CIL, is considered more than sufficient to ensure that these required improvements as well as sustainable transport measures including bus priority schemes, modal interchange and improvements to walking and cycling facilities can be delivered. These funds will also help address some of the capacity issues arising from background

6.

- 6.5.1 The Monitoring and Implementation section in the Plan sets out the primary indicators identified to monitor the successful delivery of the Local Plan Objectives and the Policies. This is a summarised position for the purposes of brevity within the Plan document itself. The Local Plan's 21 objectives build on the spatial elements of the Crawley 2030 Vision and the combination of Plan Policies identified to support each of the Plan objectives are set out beneath each of the objectives in turn.
- 6.5.2 The full details of the Local Plan monitoring is established in the Monitoring and Implementation Framework¹³

- 6.6.1 The monitoring indicators and relationship between the Crawley 2030 Vision, the Local Plan Objectives and the Local Plan policies is set out in the Local Plan's Monitoring and Implementation section. As explained in paragraph 6.5.1 above this is a summarised position rather than a comprehensive framework for monitoring the Local Plan for the purposes of the 2012 Regulations¹⁶. The Implementation and Monitoring Framework establishes the monitoring framework to accompany the Local Plan once adopted¹⁷.
- 6.6.2 In identifying the indicators for measuring the effectiveness of the Plan strategy and policies, consideration was given to each of the SMART objectives. This was undertaken with the corporate policy team for the council, providing expert advice in relation to ensuring the indicators were fit for purpose and robust: in particular, whether they were specific, measurable, attainable, relevant and time-bound.
- 6.6.3 Initially, the full range of monitoring indicators currently used to measure implementation of the adopted Core Strategy policies were subject to a comprehensive review and assessment as part of the considerations for a proportionate and effective approach to monitoring the new Local Plan once it becomes the council's adopted planning policy. This process identified a number of indicators which no longer had data being gathered to support them and indicators which did not appear to relate directly to the purpose of the Policy.
- 6.6.4 Following this, each policy was considered on its own merits and the intended outputs from each policy were identified. This ensured that the indicators would be specific and relevant to the purpose of the Policy and allow for areas of concern, under-delivery or ineffective implementation to be established at the earliest opportunity. The indicators primarily focus on the gathering of quantitative data, which ensures it is measurable, and for the use of standardised information which would continue to be available over the life of the Plan to allow for comparable, year-on-year analysis to be undertaken during the review process.
- 6.6.5 The indicators were then subject to scrutiny to ensure the data required would be possible to collect, primarily from information available to the local planning authority directly through the planning services offered; minimising the reliance on external bodies and other council departments' resources for collection of data. This ensured the indicators were attainable.

¹⁶ The Town and Country Planning (Local Planning) (England) Regulations 2012, Regulation 34

¹⁷ LP141: Crawley Local Plan Monitoring and Implementation Framework, Section 1, p2-3 (2015) CBC

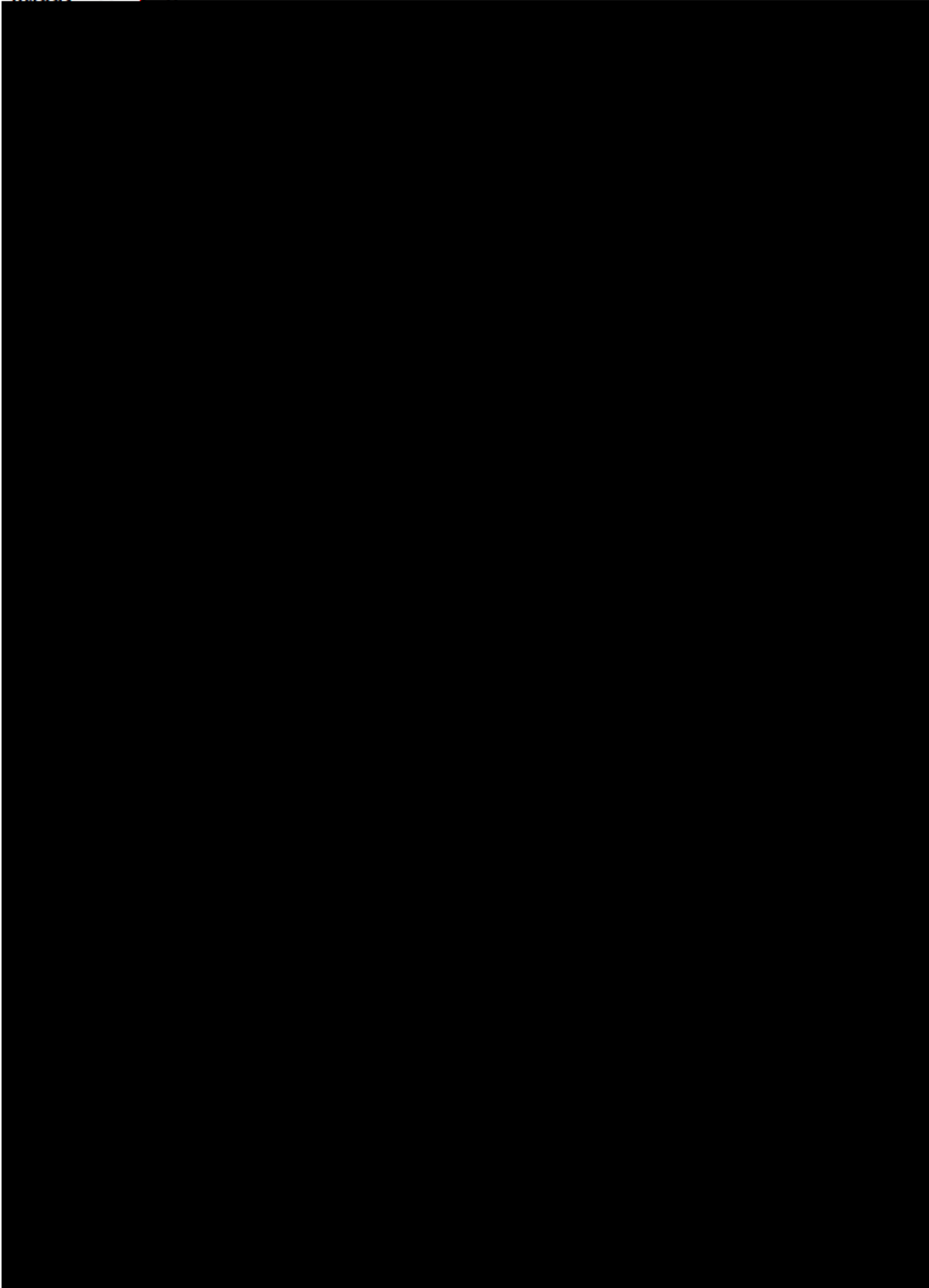
- 6.6.6 The Implementation tables set out in the Monitoring and Implementation document¹⁸ provide targets, allowing for attainable goals and timeframes. As established by the council's adopted Local Development Scheme¹⁹ and paragraph 1.37 of the Local Plan²⁰ if monitoring indicates that the Local Plan is not being

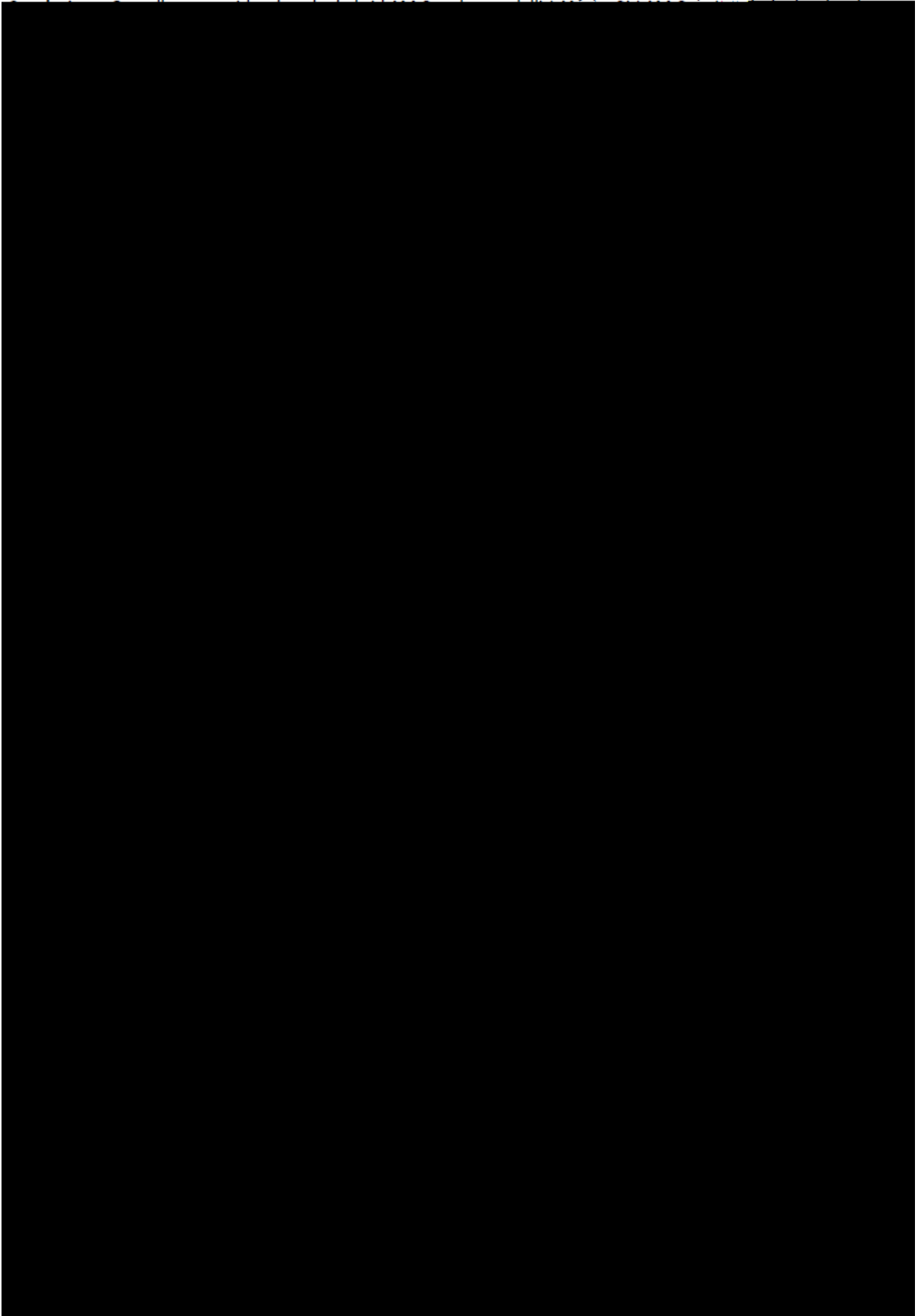
SOUTHERN WATER

Dear Beth

In response to the 'At Crawley Sites Review', Southern Water has a statutory duty to serve new development, and is committed to providing the right infrastructure in the right place at the right

Principle 5: Infrastructure







Brigden, Elizabeth

From: Cleaver, Elizabeth <Elizabeth.Cleaver@highways.asi.gov.uk>

Dear Elizabeth

I have reviewed the following comments from our consultants and we are generally content with the approach subject to a few points, I refer to them as follows:

1. The validation information is required to ensure that the AM model is representative of the network flow. If for example any of the link flows (modelled versus assigned) are significantly different, what confidence can we have in the model as it does.

2. The validation information is required to ensure that the AM example any of the link flows (modelled versus assigned) are significantly different, what confidence can we have in the model as it does.

3. Refers to 2029 NTEM factoring to match PM counted flows (presumably 2029?). This needs clarification as it does not make sense.

Safe roads, reliable journeys, informed travellers

From: Brinden, Elizabeth [mailto:Elizabeth.Brinden@ Crawley.gov.uk]
To: 'Elizabeth, Clive' [mailto:Elizabeth.Brinden@ Crawley.gov.uk]
Subject: RTS - Crawley - Road - Transport Model

Dear Elizabeth,
I have just received your email regarding the RTS - Crawley - Road - Transport Model. I will be looking at this over the next few days and will get back to you as soon as possible.

I would welcome your thoughts on the proposal set out below and whether you consider it to be a viable option for the Crawley area. I will be looking at this over the next few days and will get back to you as soon as possible.

Please note the timetable for this piece of work is extremely tight, while we do our utmost to ensure that we can meet the deadline, it is possible that we may not be able to provide a final report by the end of the project.

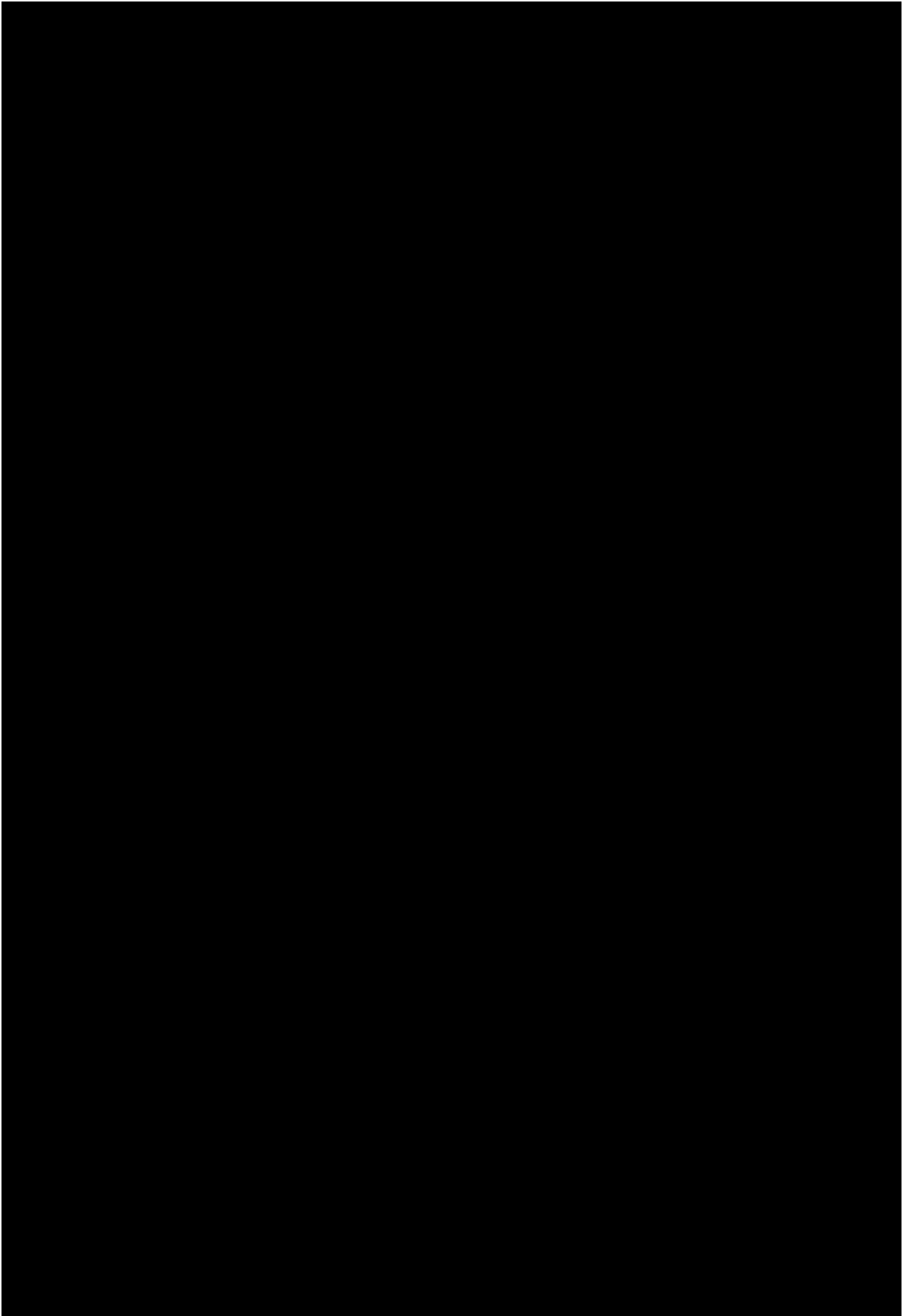
I look forward to hearing from you in due course. Please let me know if you have any concerns or difficulties with the proposal. I will be looking at this over the next few days and will get back to you as soon as possible.

Elizabeth Brinden
Planning Policy Manager
Crawley Council
Crawley, West Sussex, BN11 1AB

Elizabeth Brinden
Crawley Council
Crawley, West Sussex, BN11 1AB
Subject: RTS - Crawley - Road - Transport Model

We just got on to revisiting the task and cost proposal for further work on the RTS - Crawley - Road - Transport Model. I will be looking at this over the next few days and will get back to you as soon as possible.

I will be looking at this over the next few days and will get back to you as soon as possible. I will be looking at this over the next few days and will get back to you as soon as possible.



t: 0113 281 0456 | m: 07950 030081 | e: timothy.lynn@amey.co.uk
Unit 2A | Antler Complex | Bruntcliffe Way | Morley | LS27 0JG

