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# Report to Crawley Borough Council

by Roy Foster MA MRTPI

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detailed planning of Town Centre North. I therefore recommend a considerable number of changes which will make the CS sound for the short-term, pending an early review to provide longer-term certainty of housing provision against the requirements of the merging South East Plan. These changes are as set out at relevant points within the report.

8.

13. I discuss more detailed aspects of the strategy's housing provision in considering part 2/2 of the CS. I there conclude, amongst other things, that the identification of particular sites now, through the CS, is the only way of providing certainty of delivery of enough housing, even in the short term. I therefore support site specificity in this respect.

14. The second main reason for site specificity in the CS is the Council's ambition to make progress with a substantial expansion of Crawley's role as a retail centre. Having worked up the Town Centre North (TCN) proposal over the past 6 years or so (initially with English Partnerships and more recently also with the assistance of its intended development partner) the Council has now reached a critical point where it considers that commitment to the proposed boundaries of TCN within the CS would give impetus to the next stages of implementation. It would normally be the case that a CS would only give commitment in principle to this form of expansion, with the working-out of site specific detail left to a subsequent Town Centre AAP. However, major expansion of Crawley Town Centre already receives considerable authority from the structure plan and the draft RSS and things have now reached the point where further concerted progress on this bold, complex, and regionally important scheme requires that site boundaries be defined soon. GOSE supports that approach. In these unusual present circumstances I consider it sound in principle to adopt a site-specific approach to TCN. I consider more detailed aspects of the soundness of this scheme in my examination of part 2/15 of the CS at the end of this report.

15. Beyond the issues of housing and TCN, the CS further departs from the principle of non site specificity by making additional changes to boundaries identified on the Local Plan Proposals Map as follows:-

- (a) defining boundaries of land to be safeguarded against possible expansion of Gatwick;
- (b) defining land to be included in the study area for the urban extension known as West and North West of Crawley;
- (c) introducing a number of detailed changes to the boundary of the built-up area;
- (d) making alterations to the boundaries of the strategic gaps;
- (e) identifying land for two new 'employment opportunity areas';
- (f) identifying land within the 'Three Bridges Corridor' policy;
- (g) amending the town centre boundary by extending it outwards in 3 areas, additional to that covered by TCN.

16. With regard to (a) above (Gatwick safeguarding), I consider that national policy in the Air Transport White Paper: The future of Air Transport (ATWP) provides exceptional justification for the Proposals Map to define the limits of the land to be safeguarded for a possible future runway. I am reinforced in that view by the strong views expressed about how much land should be so safeguarded. This element of national policy clearly causes a significant and unfortunate amount of uncertainty in the area south of the airport and it is at least preferable that a definite early limit is drawn to the area subject to that uncertainty. I discuss the details of this matter further in my consideration of part 2/8, but find it sound in principle to define the safeguarded area in the CS.

17. Turning to (b) above (West and North West of Crawley), the Horsham CS Inspectors found it sound for the limits of the study area for the forthcoming cross-border Joint AAP to be defined on the Horsham Proposals Map. It is clearly logical and appropriate for the same approach

to be adopted here as far as the boundary principle is concerned, although I consider the disputed issue of where the boundary of the study area should lie under part 2/10.

18. As for (c) and (d) above, for the reasons set out in my discussion of part 2/14 of the CS, I consider it generally inappropriate for the CS to alter the boundaries of the 'strategic gaps' and the 'built-up area' from those defined in the Local Plan. In the case of the strategic gaps, national advice in PPS7 and emerging draft RSS policy provide a different contextual background from that underlying the Structure and Local Plans. As I explain in the context of part 2/14 I have concerns about some of the boundaries of the strategic gaps in the CS (and the concepts behind them) but the regional approach to gaps in the draft RSS is a matter of dispute and this needs to be clarified before the principles and site-specific details of the gaps are formally reviewed. The present boundaries should therefore be retained until they can be reviewed in the forthcoming Development Control DPD (DCDPD).

19. In the case of the built-up area, as I explain in looking at part 2/14, the CS and its evidence base provide no explanation for the most substantial of the changes to the boundary, which takes it out into open countryside. If there are supportable reasons to alter the boundary, based on a credible evidence base, this is also a matter best left to resolution through the DCDPD.

20. Dealing with (e) above, in my examination of part 2/7 of the CS I conclude that there is sufficient evidence to point the way to a reasonably reliable strategic direction for policy on employment land, and consider it appropriate for the two named 'employment opportunity areas' to be identified in the CS. As for (f), the Three Bridges Corridor is a generally sound policy, already partly implemented. Although it is a little anomalous for the Proposals Map to define the extent of the corridor precisely I recommend no change to part 2/13 of the CS or the Map.

21. Finally, turning to (g), the additional town centre extensions are not specifically explained or clearly justified in the CS, as submitted, or in the evidence base. However, having discussed the matter at the hearing sessions I do not find them unsound, for the reasons explained under part 2/15. Rather, I include changes to better explain their objectives.

22. Overall, therefore, I find it appropriate in Crawley's present circumstances for the CS to include a reduced number of site specific changes to the Proposals Map. However, the circumstances and reasons applying at this particular time do not mean that it will generally be appropriate for future reviews of the CS to adopt that approach. Nor would it be appropriate to interpret this decision as a precedent for core strategies elsewhere to include substantial site specificity unless it can be demonstrated that the sites in question are strategic ones fundamental to the delivery of the strategy.

## **Overview of my findings on the soundness tests**

### **The 'procedural' tests (i-iii)**

23. Despite a minor delay to the start of the examination hearings caused by the Council's omission of one site from the list of alternative sites advertised under Regulation 32, the CS was prepared in accordance

with the scope and general milestones in the Local Development Scheme. The first test of soundness is therefore met. Similarly, I have found nothing to suggest that the Council's extensive consultations at the various preparatory stages of the CS did not comply with the requirements of the 2004 Regulations or the then emerging Statement of Commun



Plan is sufficiently great to ensure proper consideration of all the land between the existing urban edge and the new urban extension (tests vi-ix). Part 2/11 (North East Sector) also requires some change of emphasis under test vii to make clearer the timescale and circumstances for its release for development.

35. Turning to part 2/14 (the countryside) there is no reliable evidence base for the most major of the changes to the built-up area, making this proposal unsound under test vii, while 2 of the other 3 changes are of inappropriate scale for inclusion in a core strategy. In my view these issues are best left to be resolved at a more appropriate tier of the LDF, as explained later in this report.

36. As for part 2/15, I find this generally sound, although it is necessary under tests vii and viii to make some minor changes to policies TC1 and TC2 and their accompanying paragraphs.

## **Detailed consideration of soundness issues**

### **Part 1 – Core strategy drivers and key issues**

37. In my view the submitted Core Strategy does not provide a clearly identifiable 'spatial vision', which is a key component referred to in paragraph 2.9 of PPS12. Without this it is unsound through lack of compliance with test iv. Although the Council feels that such a vision can be identified if the CS is taken as a whole, it accepts that it is not set out overtly and is largely implicit. Before the close of the examination hearings the Council brought together and presented a short statement of the spatial vision of the CS, cross-referenced to its various sources within existing parts of the strategy and without introducing new themes. The statement can still perhaps be criticised as being somewhat short on spelling out the spatial connectivity between the various elements of the long-term place-making vision. However, I consider that insertion of this text at the end of Part 1 will overcome the present omission and make the CS sound, although I have made a limited amount of change to the Council's text to make it compatible with my other recommendations.

**38. I conclude that the CS is unsound through its lack of a clear spatial vision and recommend that it be changed by insertion (at the end of Part 1 of the CS) of the text at Appendix 3 of this report.**

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Planning for Town Centres, PPS7 Sustainable Development in Rural Areas, PPS9 Biodiversity and Geological Conservation, PPS10 Planning for Sustainable Waste Management, PPG13 Transport, PPG15 Planning and the Historic Environment, PPS22 Renewable Energy, PPS23 Planning and Pollution Control, and PPS25 Development and Flood Risk.

40. In any case, it is a moot point how far local interpretation of national policies is necessary in all instances because some of the national policies address critical UK-wide and/or international issues. Some of these require response at the level of national/international policies, standards, targets and implementation mechanisms rather than reworking and refinement at the level of Development Plan Documents against a background of as-yet rather uncertain local powers and responsibilities.

41. The possible exception to the absence of a local element is the second bullet point of policy S2, and that part of the first bullet point relating to energy generation. Support for the inclusion of a specific requirement of this type can be found in PPS22 (paras 8 and 18) but there appears to be no particular evidence base that underpins or justifies the actual content of these parts of S2.

42. In my view policies S1 and S2 do not meet tests vii and viii and their inclusion is not necessary to provide 'advice to developers' or 'a hook for a proactive approach by the Council'. The national policies already do so. This part of the CS needs to be changed, deleting S1 and S2 and leaving section 1 in the form of a general commentary on sources of national advice on sustainability. If there are genuinely locally-specific aspects of sustainability that need to be worked out in distinctive detail the preferred options for doing so can be examined, brought forward and justified in a future review of the CS or (if appropriate) in other documents included in the Council's LDS such as the Planning and Climate Change SPD.

**43. I conclude that part 2/1 of the CS is unsound and recommend that it is changed by deleting policies S1 and S2 and replacing paragraphs 1.5 to 1.12 as follows:**

**Achieving Sustainable Development and Building Sustainable Communities**

**1.5 Achieving sustainable development and building sustainable communities are major aims of national planning policy. These aims underpin the development plan for Crawley, comprising the emerging Regional Spatial Strategy (the South East Plan) and the various documents produced by the Borough Council through its Local Development Scheme, including this Core Strategy.**

**The following publications set out some of the principal elements of national policy on sustainable development and building sustainable communities that are relevant to Crawley:**

**UK Sustainable Development Strategy:**

**PPS1 Delivering Sustainable Development (and the draft supplement on Planning and Climate Change):**

**PPS3 Housing:**

**PPS6 Planning for Town Centres:**

**PPS7 Sustainable Development in Rural Areas:**

**PPS9 Biodiversity and Geological Conservation:**

**PPS10 Planning for Sustainable Waste Management:**

**PPG13 Transport:**

**PPG15 Planning and the Historic Environment;**

**PPS22 Renewable Energy;**

**PPS23 Planning and Pollution Control;**

**PPS25 Development and Flood Risk.**

**1.6 The policies of these and other relevant Government publications are not repeated in this strategy but are embedded and reflected in its Borough-specific policies and proposals and will underlie the Council's decision making in all areas affected by the strategy, including those on individual planning applications.**

## **2/2 - Housing**

44. The main issues to consider here are the soundness of the CS in terms of (1) the extent of its housing provision, (2) the method it adopts for ensuring certainty of provision and (3) its likely effectiveness in identifying sufficient land. Dealing first with the extent of the provision, the CS seeks to ensure a 10-year housing land supply from the date of its adoption by extending the annualised WSSP housing requirement for

Crawley's 'unique set of circumstances') to a still more fine-grained approach to allocations within the CS.

48. In my view 100 dwellings is a low threshold to justify status as a 'strategic site' but in Crawley's special circumstances I support the concept of identifying such sites in the CS as a response to the need to achieve some certainty about tackling the backlog of provision. However, I have no evidence to support the making of allocations on any consistent basis below the Council's selected threshold of 100 and do not recommend pursuing that option in the CS context.

49. I now turn to issue 3 – the likely effectiveness of the CS in achieving an adequate supply of housing land. Of the strategic sites identified in policy H2, the Haslett Avenue and Stone Court sites are now under construction and helping to create a significant increase in the annual build-rate. However, to assess whether the improved rate is likely to be sustained it is necessary to reach a view on how many dwellings on the other H2 sites are likely to be (in PPS3 terms) 'deliverable' in 5 years (say by the end of 2011/12), 'developable' in 10 years (say by 2016/17) or, beyond that, only able to make a contribution to Crawley's needs after that year. My judgements on these sites are made against the evidence available about the particular individual circumstances of the various sites and do not differ greatly from those arrived at by the Inspector in the recent call-in case concerning the North East Sector. Overall, I conclude that the Council's delivery assumptions in the revised and updated versions of the CS housing trajectory tend towards the optimistic, in some cases excessively so.

50.

development south of Breezehurst Drive on land occupied by the existing leisure/youth centre, a car park, a children's playground, an enclosed ball games area and a small part of a playing field. A recent resolution gives skeleton confirmation of the Council's intention to proceed with the

remained after deduction of more certain sources of supply. At submission stage windfalls were assumed to contribute 140 dwellings pa throughout the period 2005-18. Although the revised trajectory produced for the examination reduced reliance on windfalls to 88-89pa I can find no basis for either figure in the Urban Housing Potential Study and it is contrary to advice in PPS3 to rely upon windfalls in the absence of genuine local circumstances that prevent specific sites being identified.

57. On the other hand, the Council have produced evidence of some 250 or so dwellings on windfall sites within permissions granted in April-November 2006. There is no reason to suppose that these will not be implemented and I therefore support inclusion of an allowance of 50 pa, derived from that source, for the 5 years 2007/08 to 2011/12. This is not much above the average annual number achieved in 1991-2003 [44pa]. It is possible that Crawley will experience more windfalls in future than in the past because the New Town may now be maturing to the point where a greater amount of natural redevelopment or 'churn' begins to occur. However, the extent of this is unknown and I consider that it would be contrary to the climate of certainty that PPS3 seeks to introduce to assume that any particular number will continue into the future. It would be more appropriate in the post-PPS3 climate to seek to identify some of these future brownfield redevelopment sites (especially those below the CS threshold of 100 dwellings) in a Site Allocations DPD, but the Local Development Scheme does not currently provide for one.

58. Additional strategic housing sites: Claims have been advanced for a number of additional strategic housing sites - at the North East Sector, Lucerne Drive, land east of Brighton Road, and land at Worth.

59. It is accepted that the North East Sector is a suitable site for a new neighbourhood. Gatwick-related considerations aside, housing completions could begin here by 2008/09 and development of the site be completed (or at least substantially so) during the CS period. However, the Secretary of State's recent appeal decision seems to leave the site incapable of development unless and until it is no longer held to be prevented by reasons related to national policy safeguarding land for a second runway at Gatwick.

60. Turning to Lucerne Drive, the owner has promoted the site for housing at all the appropriate stages of the CS preparation process but the Council prefers to retain it as a potential employment site. In considering part 2/7 of the CS I conclude that the site is unlikely to be taken up and does not need to be reserved for that purpose. As the SA/SEA process appraised the credentials of all the H2 sites in combination, the Council's evidence base provides no means of measuring Lucerne Drive against any of them individually. However, the promoters submitted a sustainability appraisal and in my view this confirms that the site's credentials in that respect rank alongside other sites within the neighbourhoods identified in policy H2. The Council accepted that the capacity of the site would just reach the 100-dwelling threshold and that, if I decided the site was not required for employment, it was open to me to identify it as an additional strategic housing site. The land has no infrastructure constraints, could probably be developed quickly to provide say 25 units in 2008/09 and 75 in 2009/10, thus making a modest, but rapid contribution towards meeting the present deficit. Overall, therefore, I consider it sound and appropriate to identify this land in the CS.

61. The land east of Brighton Road, south of Crawley, was suggested to the Council as an opportunity area at both Preferred Options and Submission stages. At the earlier stage it was put forward as an opportunity area, potentially for residential development, and at the later stage (reflecting the Council's then current aspiration for a university campus) as a location suitable for accommodating that, together with student and general housing and employment development. Following the removal of the emphasis on university development here, the promoters now suggest a revised mix of about 1100 dwellings, a neighbourhood centre, school, open space and about 4ha of employment space. The four main landowners express willingness in principle to enter into an agreement that could see delivery of housing commencing in 2010/11 and concluding in 2016/17.

62. In view of its built-up nature Crawley has little greenfield land to consider for further development and this is perhaps the only substantial area not affected at least in part by the airport-related issues holding back the North East Sector. However, Crawley has traditionally grown on the neighbourhood principle and in my view this area is not, as it stands, large enough to continue that concept successfully. Whether or not there is scope in this general area to create a neighbourhood of acceptable size, or the ability to link what is physically a somewhat isolated area adequately into the structure of an existing neighbourhood, are issues which may need to be considered in the context of the work I describe below under my conclusions and recommendations on housing land supply. At this stage, however, I do not consider it sound and appropriate to identify this land as a strategic housing opportunity.

63. At Worth there is undeveloped land in a number of parcels outside the defined built-up area. There are constraints affecting some of these areas including a conservation area and two archaeological designations, but in any case this is not a sufficiently front-loaded proposal to take forward in the CS and even if some development were acceptable here it may not reach the threshold for recognition as a strategic opportunity. In my view if any case can be made for adjusting the built-up area boundary here this is something that should be pursued through the Development Control DPD, as discussed in relation to section 4 of the CS (Countryside).

#### Conclusion on housing land supply and implications for soundness

64. I conclude from all the above that the evidence base behind the Council's housing trajectory is only partly reliable. Housing land supply in Crawley will now quickly recover the serious backlog at the end of 2005/06 (by 2008/09 against the WSSP and by 2009/10 against the draft South East Plan). Taking 2011/12 as the end of the 5-year period in PPS3 terms, the supply will remain adequate until that year measured against WSSP requirements but is then likely (unless further sites come forward) to slip back into a steadily increasing backlog. Considered against the draft South East Plan this reversal into backlog would occur earlier and then deteriorate faster.

65. As I have already indicated in my overview on soundness, this situation has serious implications for the soundness of the CS as the requirements of PPS3 (para 53) for a clear indication of a 15 year supply of land are not met. If housing were the only consideration to be placed in the balance I would have been driven to the conclusion that the CS should be withdrawn as unsound against tests iv, vii and viii. However, as I have explained in the overview, it is important that certain other very

important matters are resolved urgently through early adoption of the CS. It is also important that a firm foundation is provided for quickly recovering the current housing backlog, if only on a temporary basis.

66. In the circumstances I find the housing provisions of the CS sound, but only in a heavily-qualified way - that is, for a limited short-term period and subject to an early review of the LDF. This review will certainly include the CS, but may also require a Site Allocations DPD. It will be necessary for that review to be completed in time to provide certainty about where and when further housing development will be delivered from 2011/12 onwards for the rest of the period to 2026. I am therefore recommending substantial change to part 2/2. In my view there is no point in the CS seeking to extend its housing provision to 2018 since its content in the two added years would not be sound. The policies, the supporting text, and the housing trajectory at Appendix 1 of the CS all need to reflect and set out the basis of the provision made in the context of PPS3 against the requirements of the WSSP and draft SEP and explain that this will achieve recovery of the present backlog over the next 5 years but not provide an adequately certain long-term housing land supply. Consequently there needs to be a clear policy commitment to an early review. In addition (and as discussed under part 2/11) I consider it necessary for a sound CS to indicate unequivocally that the only bar to development of the North East Sector is that it is prevented for reasons related to the ATWP's safeguarding requirement for Gatwick. If and when the land were not held to be affected by this constraint, construction of the new neighbourhood could commence without further policy restraint without waiting to be endorsed by the review, as the function of the review would be to identify land that will be released in clearly defined phases, triggered through appropriate monitoring processes, during any such periods that the North East Sector still cannot be delivered.

67. Turning briefly to policies H3 and H4, the reference in H3 to the sequential test is too prescriptive and does not comply with PPS3. In my view this needs to be changed to give more emphasis to the sustainability of housing locations. The emphasis of the fourth bullet point is also unsound in appearing not to give more priority to public transport. I make appropriate recommendations to cover these unsound points. Policy H4 may not be entirely consistent with PPS3, but in my view it is not so far out of line as to be unsound.

**68. I conclude that the following policies and paragraphs of part 2/2**

**new housing development within the neighbourhoods and in the Town Centre as more efficient u**



2009/10, before provision declines progressively more seriously into deficit. This situation is illustrated in the Housing Trajectory at Appendix 1.

2.7 In 1993 the West Sussex Structure Plan identified the North East Sector as the most appropriate site for the next new residential neighbourhood at Crawley. However, a recent decision by the Secretary of State (May 2007) effectively precludes commencement of this long-planned development unless and until it is concluded that safeguarding of land at Gatwick does not need to continue or that the land can be developed without detriment to the aims of the ATWP. It is currently uncertain when this issue will be decisively resolved, but it may not be for a considerable time.

2.8 The Borough's continuing inability to rely on residential completions at the North East Sector makes it difficult at this time to produce a sound LDF fully compliant with the Structure Plan building rate to 2016, let alone the more demanding one of the draft South East Plan to 2026. It will therefore be essential to conduct an early review of the LDF, with a revised core strategy assessing broad locational options and, if necessary, a site allocations development plan document in place in time to provide certainty about where and when further development will start delivery from 2011/12 onwards. Unless events have then made it possible to predict a substantial stream of completions at the North East Sector, coupled with the identification of enough certain sites within the urban area, other options for greenfield development inside (and conceivably outside) the Borough boundaries may need to be considered for phased implementation if Crawley is to fulfil its sub-regional role and its contribution to the Gatwick Diamond initiative.

H1 The Core Strategy makes provision for the development of 4040 net ~~5400~~ dwellings in the Borough in the ~~plan~~ period 2001-2016 ~~as follows:~~~~8, comprised of:~~

- ~~440~~ 556 net completions mid 2001-2005~~6~~;
- ~~Outstanding adopted Local Plan allocations or Major Residential Proposals with Planning Permission for 100 Dwellings or more – mid 2001-2005 – 442 dwellings;~~
- 901 net outstanding full planning permissions to mid 2006, including Stone Court ~~– mid 2001-2005 – 390 dwellings;~~
- 32 small sites allowance to 2010/11  
250 – windfalls at 50pa 2007/08 to 2011/12 identified sites – 2040 dwellings;
- 2265 net strategic opportunity sites identified in policy H2 Residual previously developed land unidentified dwelling requirement up to 2018 – 1818 (140 dwellings per annum from 2005 to 2018).

This level of provision is insufficient to meet either the housing requirement of the West Sussex Structure Plan for 2001-2005 Tco240 0 .d21111 Tc 01 TD 0. 170.25 3j E5 0 TD -a7x

- Stone Court (Maidenbower) – under construction
- Telford Place/Haslett Avenue (as part of a mixed development)
- Lucerne Drive (former allocated employment land at Maidenbower).
- Ifield Community College (surplus education land, plus community uses)
- Thomas Bennett (surplus education land)
- Dorsten Square and surroundings (as part of the ‘Heart of Bewbush’ project)
- Town Centre North (as part of a mixed development);
- ~~East of Tinsley Lane (allied to satisfactory arrangements for replacement sports facilities);~~

The North East Sector is identified as an appropriate site for the development of a new neighbourhood for Crawley. Development here is currently precluded for reasons related to possible expansion of



changes address some aspects of this unsoundness, but I consider that the required changes need to go slightly further, as set out below.

74. While the terms of policy ICS5 are sound, the supporting text is less clear, could introduce confusion and conflict with PPS17 (test iv). The Council's List 2 changes mainly overcome this minor unsoundness and I generally support them in my recommendations.

75. Policies ICS6, ICS7 and the associated text (on health care needs) are clearly unsound against tests iv, vii, viii and ix in their references to the construction of a new hospital on land in the AONB for which the sponsoring body has no firm plans. The Council's List 1 and 2 changes generally deal with this defect by omitting such references and I support those alterations with some further minor changes of emphasis.

**76. I conclude that the following policies and paragraphs of part 2/3 are unsound and recommend that they be changed as set out below.**

**3.4 The educational needs of the town are an essential element contributing to the quality of**

neighbourhood centres or at locations within the built up area that are easily accessible to the local community by foot, cycle and all other modes of transport. Proposals which allow the opportunity for joint provision and sharing of premises will be encouraged.

#### Providing for a new University Campus

3.17 The Community Strategy stresses the need to diversify the local economy and raise skills levels. ~~The provision of a university campus in the town aims to raise skills levels and diversify the local economy away from reliance on industries related to Gatwick Airport, thus helping to create economic stability. There has been~~ A particular aim is to secure the provision of higher education by establishing a university campus in the town. This concept is supported in both the draft Regional Spatial Strategy and the Regional Economic Strategy and has also gained considerable support ~~for this~~ from the business community and public agencies because of ~~due to~~ the significant potential benefits that would accrue to the town as a whole.

3.18, 3.19 [Delete]

3.20 Work on the project is at an early stage and. However, if it becomes necessary the Council will, at the appropriate time, bring forward a site specific DPD to allocate ~~formally~~ a site and establish the planning principles for the development. ~~At that time, the ecological and landscape value of the site will be examined and any possible alternative sites considered. For the time being, the Pease Pottage Hill site will be retained as countryside.~~

ICS4 The Council will work with appropriate partners to support and make provision for a university campus and associated facilities at Crawley. If necessary and at the appropriate time the Council will bring forward a site specific D531.75 TDco26odis .75P5 0 TDm52 BT 129.75 480.75 T

Emergency unit within Crawley. However, if this position changes, the Council will make every effort to facilitate and support such a provision. In the interim, the Council will work with East Surrey Hospital and other health agencies to ensure all services are made as accessible as possible to all.

ICS7 The improved provision of higher level community and mental health facilities at Crawley Hospital and other locations readily accessible by all modes of transport is supported. In the longer term, if proposals come forward for a new hospital in the town, opportunities for accommodating this will be sought at a highly accessible location on the edge of the town, with access by all modes of transports, particularly public transport. The provision of improved public transport access for residents of Crawley to East Surrey Hospital will be supported.

## Part 2/4 – Environment

77. This part of the strategy is mainly sound, if rather detailed. However, policy EN1 is unsound against test iv because it appears to offer precisely the same level of protection to a variety of different nationally and locally recognised nature conservation features, and to the AONB. This defect is overcome by the Council's List 2 changes which contain reference to the relevant national sources of advice in which the approach is more tiered. They also correct the downplaying of the importance of semi-ancient woodland. I support and recommend these changes.

78. A similar point arises in relation to policy ENV5, concerning the built environment but the Council's proffered List 2 changes (most of which I support and recommend) again overcome the unsoundness.

79. I conclude that the following policies and paragraphs of part 2/4 are unsound and recommend that they be changed as set out below.

4.3 Environmental features that should be protected and (wherever possible) enhanced include:-

- Areas of Outstanding Natural Beauty (AONB)
- Sites of Special Scientific Interest (SSSI)
- Sites of Nature Conservation Interest (SNCI)
- Sites where protected species are present
- Local Nature Reserves (LNR)
- Ancient and semi-ancient woodland
- Aged and veteran trees
- Networks of natural habitats

~~Semi-ancient woodland also has significant value and should be protected and enhanced wherever possible.~~

[Then remainder of paragraph as submitted]

EN1 [ T h e <sup>ancient</sup> a n c i e n t w

possible enhanced. These assets include Listed Buildings, Conservation Areas, Scheduled Ancient Monuments and other features of archaeological interest, and Registered Parks and Gardens. Guidance on these assets can be found in PPG15: Planning and the Historic Environment and PPG16: Archaeology and Planning.

4.10 In addition to Conservation Areas, local designations assets in the Borough comprise Areas of Special Environmental Quality (ASEQ) and unlisted buildings which are important and interesting features in the street scene or have a place in local history. Guidance on these assets can be found in policies BN10 and BN16 respectively, saved from the Crawley Borough Local Plan 2000, and will be included in the forthcoming Development Control Policies DPD.

EN5 [Retain first paragraph but delete remainder of policy]

## Part 2/6 - Transport

80. At core strategic level the CS should aim to provide a clear and coherent Crawley-specific vision of the way in which the development pattern and transport infrastructure of the growing town will be progressively better integrated in order to assist the national objectives set out in PPG13 - promoting more sustainable transport choices, encouraging accessibility to everyday destinations by public transport, walking and cycling, and reducing the need to travel. However, the strategy only partially succeeds in doing this: section 6 provides generally reactive, non-spatial, development-control-type policies instead of setting out a proactive spatial vision. Some of the introductory paragraphs of section 6 begin to develop appropriate themes, but the overall content falls short of indicating the components of a fully-developed and concerted drive towards a more sustainable pattern of development, land use and transport infrastructure. To some extent this is understandable because the Crawley Area Transport Plan (CATP) also lacks focus as a visionary guide and mainly restricts itself to identifying matters still to be studied and investigated. I conclude that the transport element of the CS will need clearer policy development and expression at the next review. This should probably include some form of target for modal shift and indicate the (what at present seem to be rather uncertain) future priorities for expansion of the Fastway network both within and beyond Crawley. In the absence of such work my recommended changes to the headline 'key issue' and policy T1 (as set out below) are the minimum requirements to make the CS sound under tests iv and vii in terms of providing an appropriate strategic focus for transport.

81. Looking at the headline key issue, my changes will signal a move towards a more appropriate approach as far as this is achievable at present, focus on meeting transport 'needs' rather than 'demands' (which may not be capable of being met by the preferred modes of all organisations and individuals) and delete the reference to 'without excessive harm to the environment'. The latter suggests conflict with the UK Development Sustainable Strategy, a guiding principle of which is 'living within environmental limits'. I also recommend the inclusion of the present Fastway routes as a strategic component of the Key Diagram.

82. Turning to the other three transport policies, these pick up on some of the main strands of the principal policy (T1) but all fail the soundness tests in various ways. The issue for T2 on park-and-ride (P&R) is whether or not the policy in its present form has a sufficiently firm foundation to meet soundness tests vii and viii. Much work clearly remains to be done to establish the level of real potential for P&R in

Crawley and whether it would be feasible and viable to introduce it. The CATP gives little prominence to P&R and no positive commitment to developing a system in the next decade, so in my view T2 must be recast to commit the Council to a clearer, stronger leadership position in coordinating the investigation of the potential role of P&R and (if, appropriate) taking it forward thereafter. As currently worded T2 inappropriately appears to delegate much of the task of investigation and implementation to developers, particularly the principal town centre developer, whereas the Council (with its more independent and wider-ranging responsibilities) should be the lead-player. I recommend changes to the policy and paragraphs 6.5 to 6.7 to make clear that the Council will adopt this lead role, as well as avoiding what may be some premature conclusions about the outcome of the feasibility study of the concept.

83. Looking at policy T3 (parking), the CATP refers to the development of a parking strategy covering on and off-street parking. Soundness, measured against tests iv and vii, requires that strategy to be the central focus of T3, with less emphasis given to its current development control aspects. I recommend accordingly below.

84. Dealing finally with T4 (improving rail stations), the policy is mainly broadly consistent with the CATP (soundness test iv) and appropriate in what it has to say about the planned major interchange improvements at Gatwick and Three Bridges railway stations, and the roles and opportunities identified for the two other stations in the Borough. However, I consider it inappropriate for the role of Gatwick Station to be explicitly limited to catering only for air passengers and airport staff. As one of the key elements contributing to the Crawley-Gatwick regional transport hub, the station is a highly strategic point for transport interchange and it is said that Network Rail is considering substantial investment here. In my view it will be important to seize any available opportunities for broadening the function of Gatwick station as an interchange for surface travellers (particularly between rail, coach, Fastway and other buses) provided that airport-related interchange functions (and the achievement of the targets of the Gatwick Airport Transport Strategy) are not hampered by any such developments. I recommend a small change to achieve soundness in this respect.

85. As for the possible station to the west of Crawley, this would almost certainly be outside the Borough. In my view soundness in terms of test vi requires no more than the reference in section 9 of the CS (in the context of the JAAP).

**86. I conclude that the following policies and paragraphs of part 2/6 are unsound and recommend that they be changed as set out below.**

Headline key issue: Achieving better and more sustainable integration between ~~Securing improvements to the local transport infrastructure of the town and the developing needs of the growing town, its communities and its which meet the demands of an expanding economy, and the needs of the local community without excessive harm to the environment.~~

T1 The Borough Council will work with the County Council and other key authorities, agencies and stakeholders seek to ensure a more comprehensive and sustainable integration between the local transport infrastructure and the changing transport needs of the developing town, its communities and its expanding economy. Particular importance will be placed on: ~~In particular: that new development meets its access needs:~~

- improving and developing p



- easing congestion at key points on the primary road network;
- concentrating development in locations where sustainable travel patterns can be achieved through use of the existing transport network or timely improvements to it;
- locating more intensive, and higher density developments should, wherever practicable, be located at nodal points along the developing main public transport and cycling/footpath networks;
- New development should contribute to the improvement of sustainable modes through on site provision and through S106 agreements which secure improvements to Fastway, bus service provision, cycling and walking;
- Where necessary, new development will be required to contribute to road network improvements needed to accommodate the scheme;
- employing travel plans wherever possible Major development proposals and other proposals likely to generate significant movement of people and goods should be accompanied by travel plans specifying how that movement will be managed to minimise limit the use of less sustainable forms of transport.

#### Park and Ride

6.5 ~~The Council considers that Park and Ride may have~~ has the potential to play an important part in the overall transport and parking strategy for the town, particularly for the Town Centre, especially if integrated with the Fastway system. ~~It is likely that the focus for a Park and Ride facility would be to provide parking for long term commuters as long stay parking in the Town Centre will be limited, although it would also be available to shoppers and visitors.~~

6.6 The Council will therefore carry out a study of the role, feasibility, funding and operation of Park and Ride across the Borough in association with the County Council, bus operators, the principal town centre developer and other appropriate partners, would be expected to be examined in relation to major developments within the town, particularly the Town Centre. The feasibility assessment will consider both the operational and locational feasibility of a Park and Ride facility. Consideration may need to be given to whether a successful system would require the identification of ~~finding~~ appropriate sites beyond the Borough boundary.

6.7 [Delete]

T2 The Borough Council will work with the County Council and a wide range of other partners and stakeholders prospective developers, particularly in the Town Centre, to establish the role, need for and feasibility, funding and future operation of a Park and Ride system, including the location of appropriate sites.

[Delete second and third paragraphs]

If the decision is made to introduce a Park and Ride system

~~parking. The level and type of parking provision should take into account:-~~ [Retain remainder of policy unchanged]

#### Improving Rail Stations

6.9 The main rail stations and the areas immediately surrounding them provide

of 350,000sq.m for 2004-2018). The review of the Atkins study by Tym and Partners considers the ELR methodology wanting, suggesting (among other criticisms) that too much weight is placed on trend projections and an unreliable business survey; it estimates need at 126,000sq.m. On the other hand, Halcrow's review of the ELR concludes that while the CS adequately provides for the 'base case' of requirements, provision should be increased to 461,000sq.m to make the most of the recognised strategic importance of Crawley/Gatwick as an economic driver and to better provide for qualitative needs for new land in Crawley.

90. The ODPM guide on ELRs notes the difficulties in building a meaningful picture of employment land and supply using data derived from different sources, accepts the inherent limitations of the available forecasti

elements of which did not stand up to examination, rather than making more broadly-based estimates of the likely yield of natural or induced churn of existing sites, especially within Manor Royal, over the CS period. In my view some of the broad estimates that I asked participants to make about the way in which the E2 locations could contribute towards meeting the residual of the requirement in policy E1 also underplayed the potential of redevelopment as a source of supply.

94. Turning to Lucerne Drive, this site has for some time been allocated for employment use and planning permissions for office development have existed since the late 1990s. Despite a considerable marketing campaign

not (among the totality of sites in Crawley) uniquely or specially favourably placed to accommodate companies seeking the most prestigious locations. I therefore recommend the deletion of the reference to these areas under part 2 of the policy. For the same reasons I also recommend deletion of policy MC2 and the preceding paragraphs (9.5 to 9.7) as these also give the impression that the opportunity areas have qualities not present elsewhere.

97. Dealing with issue 4, I find policy E3 generally soundly justified and the criteria included within it sufficiently flexible to allow changing circumstances to be properly taken into account in the context of individual sites. However, logic suggests that the final bullet point is a self-contained one applying, for example, to outmoded or outworn premises and is not linked with the preceding four points, which also describe discrete situations in which the marketing criterion would not particularly apply. Thus, soundness against test vii would require the



**E2 [Delete references to Lucerne Drive and Gatwick Airport in E2 (1) and delete the final sentence of E2 (2).]**

**E3 [Substitute 'or' for 'and' after the fourth bullet:**

**Insert 'or' after the fifth bullet, and**

**Include a sixth bullet as follows:- 'the site is within an area identified for an alternative form of development in the Core Strategy'.]**

**MC2**

air quality, and sustainable drainage. These matters are already mentioned in paragraph 8.5: supplementing them would merely contribute to loss of strategic focus. In my view these and other suggestions exemplify some participants' lack of appreciation of the fundamental differences between a CS and an old-style local plan.

107. However, there is a further element of unsoundness related to policy G1. This is the identification on the Proposals Map of an area shaded blue, entitled 'proposed development at Gatwick Airport'. The CS and evidence base provide no explanation of (or justification for) this area. It was said to originate in Supplementary Planning Guidance for the airport. There appears to be no core strategic reason to distinguish this part of the G1 policy area and its inclusion on the Proposals Map serves only to confuse. In my view test vii requires its deletion.

108. Turning to policy G2, this provides a major focus of concern about the soundness of the CS. The most fundamental issues here are (a) the terms of the policy to be applied to the area safeguarded against the possible need for a second runway and (b) the geographical extent of the area to be protected in this way.

109. Dealing with issue (a), the terms of the policy, the ATWP says (para 12.3) that *'Land outside existing airports that is needed for future expansion will need to be protected against incompatible development in the intervening period. Under the current planning system, such land is only formally protected once it is either reflected in the local development plan or when planning permission is granted for the airport development.'*

110. In my view the clear implication of a policy protecting land from 'incompatible development' is that planning permission will be refused for most forms of development, other than minor changes of use and small-scale building works. Otherwise there is a clear risk



*appropriate protect sites and surface access routes, both existing and potential, which could help to enhance aviation infrastructure; and avoid development at or close to an airport or airfield which is incompatible with any existing or potential aviation operations.'*

112.

Highways Agency the nature and extent of any appropriate works. As indicated by the studies, such new links could potentially occupy a significant area of land west of the motorway between junctions 9 and 10. In my view it would be inappropriate to reserve particular corridors for new links at present, especially if those corridors were then frozen as the only candidates (and consideration of other possible options ruled out) by subsequent development outside the selected lines on other land between the M23 and the present airport boundary. A second example of need for flexibility within the safeguarded area is that given in IMP para 9.34 – ie, sites for relocating businesses displaced by the expansion which could otherwise risk closure for want of suitable local sites. While such uses would not normally figure very high on the PPG13 hierarchy of relatedness, national policy on the airport could be harder to achieve without some built-in flexibility of this kind.

118. My overall conclusion is that avoidance of prejudice to national policy requires that a soundly-defined boundary to the safeguarded area must not take an excessively under-inclusive or prematurely restrictive approach. From the evidence presented to me and the considerable discussion of the issue at the examination

121. I conclude that the following policies and paragraphs of part 2/8 are unsound and recommend that they be changed as set out below.

Proposals Map - Delete the blue-

~~Within this area, development would not be permitted which would prejudice the integrity of the safeguarded area and BAA's ability to bring forward a wide spaced runway, should it be required.~~

~~Small scale Minor development within this area, such as changes of use, and small-scale building works, such as residential extensions ~~which would not prejudice any future proposals for a second runway, would will~~ normally be acceptable. BAA Gatwick will be consulted on all planning applications within the safeguarded area.~~

~~The safeguarded area may be subject to review dependant on the outcome of studies and~~

126. Turning to the content of policies W1 and W2, the greatest difference between Crawley CS and the adopted Horsham CS is the policy stance of the two in relation to the need for the proposed relief road between the A264 and A23. The former (through policy W2) makes this a definite requirement, in line with the WSSP, the CATP, and the Borough Council's stated preference. The latter (through policy CP6) adopts a more flexible position, leaving the determination of 'sufficient transport infrastructure' and consideration of the need for the road to be decided through the JAAP. I find this the correct course of action. Soundness in terms of tests iv and vi therefore requires the deletion of policy W2 and the inclusion of words within policy W1 more closely aligned with the relevant parts of Horsham CS policy CP6. As a result of this change the emphasis of paragraph 10.9 also needs to be slightly changed (without removing reference to the Council's preference) and its position moved.

127. There are also two other matters requiring change to bring about sound alignment between the two Core Strategies under tests iv and vi. The first is the treatment of 'employment provision' beyond that associated with the normal requirements of a neighbourhood centre. I have considered the potential role of this development area in relation to part 2/7 of the CS and my conclusion is reflected in the recommendation below. This follows the wording of Horsham policy CP6 but sets the reference in the broader, more current context of the Gatwick Sub-region.

128. The second matter is that I find it inappropriate for the Crawley CS not to include the Horsham reference to new development protecting the setting of Ifield Conservation Area, especially as the Conservation Area is within Crawley and the study area will now cover much of it.

**129. I conclude that the following policies and paragraphs of part 2/10 are unsound and recommend that they be changed as set out below.**

**Proposals Map – extend the study area to include all the land in the arc from Bewbush round to County Oak between the Borough boundary and the defined built-up area [that is, the built-up area as defined in the Local Plan rather than in the CS – see my discussion of part 2/14]**

**WI A Joint Area Action Plan for the Strategic Development Location West and North West of Crawley will be prepared jointly by Horsham District Council and Crawley Borough Council and will:**

- Be supported by further work, studies and consultation documents and stages;
- Cover the Area of Study for the Strategic Development Location West and North West of Crawley, as defined on the Proposals Map;
- Make provision for a high quality mixed-use neighbourhood development comprising of up to 2,500 dwellings (including 40% affordable housing), a new neighbourhood centre (potentially comprising of shops, employment floorspace, a community hall, a primary school, a doctor's surgery, a library, a public house, public open space) ~~and employment provision~~;

\* Include the possible provision of new employment, beyond that required in a neighbourhood centre, including the possibility of a strategic employment allocation to meet the needs of the Gatwick Sub-Region;

- Include consideration of other uses which may be required to meet wider community needs;

\* Include the provision of sufficient transport infrastructure to meet the needs of the new development while maximising the opportunities for sustainable travel, including reducing dependency on the car by providing access to local facilities and services, providing high quality passenger transport links (such as Fastway and/or a new interchange station) and

ensuring safe, alternative and convenient pedestrian and cycle routes between the development and Crawley and to the countryside;

\* Determine whether there is a need for any relief or link road between the A264 and A23, the route for any such road, and the means of providing it;

\* Ensure that new development protects and where possible enhances the setting of the Ifield Conservation Area;

- Translate the key principles and objectives for development into policy;
- Outline the masterplanning and sustainability principles for the development.

10.9 [Reword as follows and place before policy W1]

The adopted West Sussex Structure Plan (2001 – 2016) requires the construction of a relief road

to be a preferred option, to be implemented if and when possible, with the function of the review being to identify land that will be released in clearly defined phases, triggered through appropriate monitoring processes, if the North East Sector still cannot be delivered. My recommended changes to parts 2/2 and 2/11 present the North East Sector in this more positive light – an opportunity to be seized if and when the chance becomes available, rather than one held as a long-term reserve, only to be activated after review of the LDF.

**133. I conclude that the following policies and paragraphs of part 2/11 are unsound and recommend that they be changed as set out below.**

Change paragraphs 11.1 to 11.10 by replacing them as follows:

11.1 The North East Sector was identified in the West Sussex Structure Plan 1993 as a suitable location for an additional new neighbourhood for Crawley and land was allocated in the Local Plan of 2000 for the development of up to 2700 dwellings and other uses. A planning application for the new neighbourhood was submitted in 1998, but as the Government was intending to bring forward a White Paper on the Future of Air Transport it issued an Article 14 Direction in March 1999 preventing the Council from granting planning permission without his authority.

11.2 The eventual White Paper, issued in December 2003, retained the option of developing a second (wide-spaced) runway at Gatwick to be exercised after 2019 if it proves impossible to pursue the nationally-preferred option of a third runway at Heathrow. In May 2007 the Secretary of State dismissed an appeal against non-determination of the 1998 planning application for the North East Sector on the grounds that if the development were to proceed (a) the configuration of any new runway might have to be altered, which could reduce the ultimate capacity for the airport and (b) aircraft using a second runway would result in noise levels within the new housing area well beyond those likely to cause community annoyance and significantly in excess of 60dB which PPG24 recommends as a desirable upper limit for major noise sensitive development. In addition the Secretary of State considered that circumstances in May 2007 presented no immediate need to release the site to meet housing need judged against provision at Structure Plan rates in the period to 2012.

11.3 A final decision whether or not a second runway will be needed at Gatwick may be several years away. However, in the meantime there will soon be an increasingly pressing need to identify more housing land in Crawley to meet the higher, long-term annual growth requirements set out in the draft South East Plan to 2026. An early review of the Local Development Framework will therefore be undertaken. Notwithstanding this, in view of Crawley's sub-regional role, it is important to retain the option for development at the North East Sector to commence as soon as may be possible if and when this is not prevented by reasons related to national policy safeguarding land for a second runway at Gatwick. The North East Sector is therefore identified and safeguarded as a strategic housing development opportunity to come forward if (and as soon as) this becomes possible.

11.4 Any residential development at the North East Sector will only take place in the form of a sustainable and comprehensively master-planned new neighbourhood, reflecting the existing urban structure of the town. Partial development of the sector would undermine these principles. On the other hand, if Government policy were to require a second runway to be built, the opportunity will be taken to explore alternative forms of development for this area, including accommodating any commercial development displaced from the site of the runway.

Objectives

11.5 The key objectives and principles for development of the North East Sector are:

~~• To minimise the uncertainties arising from the Government Aviation White Paper in terms of the future development of the North East Sector and the overall provision of housing within the Borough;~~

~~• To facilitate the ability for the phasing of the development of the North East Sector in the context of a definitive decision regarding the requirement of a second runway at Gatwick, future Local Development Frameworks, the North East Sector Area Action Plan and Government planning policy guidance;~~

~~• To safeguard the North East Sector for the development of a new neighbourhood if and when this becomes possible without prejudice to the aims of the Air Transport White Paper; secure at~~

~~the appropriate time the development of a new neighbourhood in accordance with the neighbourhood principle;~~

- To ensure that any new neighbourhood here adopts high standards in housing quality, local facilities and services, residential environment and sustainability objectives and principles;

\* To ensure that development avoids areas of flood risk and existing or possible future aircraft noise contours of 60 dBA Leq or more;

- To ensure provision of ~~that~~ all necessary local facilities and services, which will include affordable housing, a new neighbourhood centre (potentially comprising ~~of~~ shops, a community hall, a primary school, a doctor's surgery, a library, a public house, public open space) and employment provision ~~are provided~~;

[remaining bullet points unchanged]

NES1 The North East Sector is identified and safeguarded ~~retained as for the development of~~ a new neighbourhood ~~phased~~ to accommodate up to 2,700 dwellings and other uses ~~in the longer term, subject to the Government's decision regarding the requirement for a wide spaced parallel second runway at Gatwick.~~

NES2 If it is able to proceed, the North East Sector must be ~~will be~~ delivered as a sustainable and comprehensively master planned neighbourhood ~~and may be potentially subject to an Area Action Plan.~~ The developmen 134.



other than the very brief material at CD16 (paras 9.1-4) and CD17 (paras 4.1-4). The principal change in the boundary is within the area north of

140. Significantly, the draft RSS recognises the inconsistent approach to strategic gaps across the region, where some counties have designated them and others not. Policy CC10b and paras 1.33-38 aim to secure a more common approach, keeping the focus on strategic gaps. However, para 1.38 leaves the door ajar to identification of local gaps, if justifiable. This aspect of the draft RSS has been subject to considerable debate at the EiP, including the issue of whether there is true need for the additional layers of protection afforded to gaps, given the protection for the countryside in general through PPS7. Consequently the regional basis for taking forward the concept of gaps remains unresolved and indeed highly disputed, especially the principle of local gaps.

141. The uncertainty about future regional policy on gaps is compounded by the way in which the CS interprets gap policies inherited from the WSSP and the Local Plan. The WSSP identified 4 strategic gaps impacting on Crawley, whereas these were taken forward in the Local Plan in a reduced number of areas (3) using different headings. The CS now makes further changes to their number, descriptions and defined boundaries and rather confusingly labels the gaps 'local strategic gaps', which is a clear contradiction in terms.

142. From the above I find that the gaps identified in the CS have unclear status or justification in national and regional policy. With the possible exception of the Crawley-Gatwick gap it may be doubtful whether the CS gaps have a truly strategic function or add anything much to national and regional policies for the protection of the countryside. In the present circumstances I consider it unsound against tests iv and vii for policy C2 to engage in further development of the Local Plan's policies on gaps. If and when the RSS supports retention of the concept and provides a surer policy background, the relevant Local Plan policies and site-specific designations can be reviewed as part of the DCDPD. That would be the right time to assess the merits of the various conflicting changes to the boundaries of the gaps proposed by the Council and would be tci6 Tw5eprcT4icw1o0 Twlgnationsdaries of t fo32 TD --0.0923 9

~~14.23 Until the regional framework is clarified it is inappropriate for further changes to be made to the gaps identified in the Local Plan. This issue will therefore be revisited in the context of the Development Control DPD (DCDPD), due for submission to the Secretary of State in January 2009. Part of the countryside is also designated as Local Strategic Gap in order to prevent the town coalescing with surrounding settlements, including Gatwick Airport. The erosion of gaps between Crawley and surrounding settlements would threaten the separation and individual identity and character of Crawley. Representations received during the consultation process for this strategy have revealed mixed views about the need to retain the concept, the roles of various areas as either "strategic" or "local" gaps, and the appropriate extent of any designations. In respect of the need, role and extent of Local Strategic Gaps were mixed. Some supported the retention of gaps in their current form, whilst others proposed small a range of alterations to ensure that the boundaries of any land designated gaps either supports its the strategic function in of preventing coalescence between settlements or enable. Some alterations were also proposed by land and property owners on the basis of enabling more appropriate forms of development at the boundary of a local strategic gap.~~

#### Objectives

[Retain paragraph 14.3 as paragraph 14.4]

#### Development Beyond the Built-up Area Boundary

14.45 Open countryside beyond the built up area of the town is important as a natural resource and forms an important setting for the town, even though the amount of countryside within the Borough is relatively small. Generally, the countryside, particularly at the urban fringe, ~~will should~~ be protected from development which does not need a rural location. Where necessary the quality of the countryside should be enhanced, possibly through encouraging informal recreation.

14.5, 14.6, 14.7 [Delete]

~~14.6 As the Core Strategy is not the appropriate vehicle for undertaking a comprehensive review of the built-up area boundary the Proposals Map makes only one change from that shown in the Local Plan, in order to facilitate a strategic housing development at Bewbush. The boundary as a whole will be reviewed in the context of the DCDPD referred to above. The DCDPD will also consider whether there are any Crawley-specific countryside issues requiring further detailed policy development and expression.~~

C1 The countryside beyond the Built-Up Area Boundary ~~will should~~ be protected for countryside uses and enhanced and improved for example, ~~by for~~ informal recreation use. ~~Planning permission for development should only be allowed beyond the Built-Up Area will only be granted if it would be consistent with national policy, particularly that in PPS7: Planning and the Countryside, and requires a countryside location and would be sympathetic to the existing quality and character of the wider countryside.~~ [Delete remainder of policy]

#### Setting of the Town

14.7 The setting of the town is ~~partly addressed~~ protected through ~~protections of (a) the status of the small area forming designated as part of the High Weald Area of Outstanding Natural Beauty, (b) the countryside status of the area outside the built-up area defined on the Proposals Map, and (c) the continued designation of the strategic gaps brought forward from the Local Plan pending review in the forthcoming DCDPD. The latter are areas given through Policy C1, and through the local Strategic Gap. Strategic Gaps are designated areas of land with additional protection from development in order to protect and enhance the separate identity and character of Crawley and to prevent coalescence with other settlements. Some exceptional forms of development may be permitted as currently provided for in saved Policy C3 of the Adopted Local Plan 2000.~~

14.8 [Delete]

C2 The Council will seek to prevent development within the ~~Local~~ strategic gaps in order to protect the ~~towns separate identity of the named settlements and prevent their and the actual or perceived coalescence. of the town with other surrounding settlements.~~ The following ~~local~~ strategic gaps ~~have been identified on the~~ are brought forward from the Local Plan Proposals Map on an interim basis pending review after adoption of the South East Plan:

- ~~Gatwick Airport and Charlwood~~ Crawley and Gatwick Airport/Horley;
- ~~Gatwick Airport and Manor Royal / County Oak~~ Crawley and Horsham;

- ~~Gatwick Airport and the North East Sector;~~
- ~~Crawley and Pease Pottage.~~

## Part 2/15 - The town centre.

144. Policy TC1 is a major element of the CS. I assess its soundness against tests viii-ix under the following issues: - (a) is the nature and scale of TC1 the most appropriate in the circumstances?; (b) is it appropriate for the CS to be site-specific about TCN and, if so, has the boundary been soundly drawn?; and (c) is there a clear mechanism for implementing TCN and is the policy flexible?

145. (a) Nature and scale of policy TC1 Major expansion and repositioning of Crawley town centre has been under consideration for some time. There is policy support from the WSSP and the draft RSS. The former states that *'To help keep retail expenditure within the local area it is likely that Crawley's provision, in particular, will need to grow*

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148. The retail studies conclude that much of the impact of substantial

consider that a critical point has now been reached. In order to give

Principles Statement [CD31], commit to relocation of the Town Hall, and work with John Lewis Partnership (who wish to open a store in the town) to find a developer. In July 2005 Grosvenor Developments, a major international developer with a considerable track-record in complex town centre schemes, was chosen for that purpose and a cooperation agreement was signed in April 2006. Since then heads of terms have been agreed between Grosvenor and the key tenant, John Lewis, and the master-planning of TCN has picked up pace, including preparation of the 'Town Centre North: Development Principles draft SPD' [CD79], the consultation period for which closed in April 2007.

157. The content and detail of the draft SPD 'cart' cannot be given precedence over the CS 'horse' and in any case my role does not include examining the soundness of the former document. However, the extent of the work put into master-planning in the past year or so, including the preparation of the draft SPD (and the substantial consultation undertaken upon it) is evidence of purposive action being taken by the partners to formulate an appropriate detailed scheme which they will be able to implement. Although there is still some way to go it seems to me, from all the evidence I have seen and heard, that there is a reasonable prospect of them being able to do so. In terms of the delivery mechanism the SPD records (paragraph 18.1) that the Council is working closely with the developer to achieve delivery of TCN in the shortest possible timescale consistent with the statutory process and ensuring effective public and stakeholder engagement. It also states that a comprehensive approach is essential for the successful development of this complex site (paragraph 18.2) and indicates that the developer should work with landowners to secure agreement, that both the developer and the Council will look to acquire properties, and that if necessary the Council will exercise its compulsory purchase powers. Paragraph 18.3 recognises that a phased approach will be required, beginning with relocation of the Town Hall to an alternative site within TCN.

158. At this stage it cannot be guaranteed that all the major requisite necessary contributory factors (eg statutory approvals, land assembly, relocations, and financial viability) will combine to allow policy TC1 to be implemented. However in my view there is evidence that the Council and its experienced partner are developing a sound, well-considered and practical approach towards phased implementation and there is a reasonable prospect of this being achieved. Some uncertainty about the achievable commencement and completion dates is bound to remain at this stage but this will always be the case for a substantial project at this point in its evolution. The developer estimates that the scheme will commence in 2010 and be completed by the target date of 2015 set in Part 3. I have no reason to consider those dates fundamentally unsound, although the matter will need to be monitored.

159. Nonetheless, the CS itself rather lacks explanation of the way that policy TC1 will be implemented. I therefore consider it necessary under soundness tests vii and viii to insert a new paragraph briefly setting out the need for the scheme to be delivered on a comprehensive basis, recording that a development partner has been selected to progress it, and indicating that it will be implemented on a phased basis.

160. With regard to flexibility (test ix), if the CS is changed as indicated in the previous paragraph it may be considered less 'flexible' than it appeared to be before alteration because it would lock more firmly into the situation that has developed. However, I see this as an inevitable





encouraged. The named locations can be retained as indicative examples rather than a comprehensive, site-specific list. My recommendations make the policy sound in those terms. As far as the indicative locations are concerned, I am satisfied from what I heard that they are reasonably sound in terms of tests vii and ix.

166. It will be apparent from the above that I do not find it necessary to identify further sites or locations within the indicative list in TC2 as the whole emphasis of the policy is changed to one of more general welcome for mixed use development at any appropriate location within the area defined on the CS Proposals Map. The area so defined extends the town centre boundary outwards in 3 locations (in addition to TCN) as compared with the Local Plan Proposals Map. This is another example of site-specificity which is unclearly justified in the CS or the evidence base but from what I saw of the nature of these areas the expansions add significantly to the potential created by TC2 for mixed-use development in the area between the Main Shopping Area and the Town Centre boundary and I do not regard them as unsound. I recommend no further expansion of the boundaries shown on the Proposals Map (nor any retractions) but consider that soundness test vii requires that it be made clear in policy TC2 that material net gains in retail floorspace will normally be inappropriate within the area covered by the policy.

167. Referring briefly to policies TC3 and TC4, the intention of these policies is generally consistent with national policy in PPS6, modified in an appropriate way to give preference to TCN in view of its special significance to the town and the investment confidence that will be needed to see it through to implementation. However, inconsistency and confusion are again introduced by inappropriate references in both policies to the 'Primary Shopping Area', while the title of TC4 inappropriately refers to 'Out of town centre development' instead of 'Retail development outside the Main Shopping Area'. Paragraph 15.18 also requires some rewording to bring it clearly into line with national policy. My recommendations deal with this unsoundness.

**168. I conclude that the following policies and paragraphs of part 2/15 are unsound and recommend that they be changed as set out below.**

**15.8 Retail Capacity Studies undertaken in 2000 and again in 2005 and 2006 have identified**

The scale and complexity of the Town Centre North scheme is such that it needs to be delivered on a comprehensively master-planned basis. The Borough Council has therefore selected one lead developer to act as its partner in the project. In order to provide the necessary certainty to make progress with the scheme the boundaries of the land required for a comprehensive and successful scheme are defined on the Proposals Map. If necessary the Council will employ its compulsory purchase powers to assist assembly of the site. Implementation of the scheme will be phased, commencing with the construction of a department store and a new (relocated) Town Hall.

TC1 ~~The~~ Town Centre North ~~site~~ is identified and allocated for a major mixed-use, retail led development (in the region of 50,000sqm net gain of comparison floorspace) to help Crawley fulfil its role as a primary regional centre, enhance the retail offer within the subregion, and act as a catalyst for a step change in the facilities, quality and environment of the whole Town Centre. The development will need to be carefully integrated with the current centre and should also include an appropriate range and quantity of high quality offices (including a new Town Hall), about 800 residential units, and a range of leisure, community and other uses. The extent of the site is defined on the Proposals Map.

Area of additional mixed use ~~Alternative Town Centre~~ development opportunities

15.14 Within the area between the Town Centre boundary and the Main Shopping Area boundary the Council wishes to encourage mixed use development in cases where this will maximise the appropriate potential of outworn buildings and underused land and -In order to complement the Town Centre North proposal, several strategic opportunities for mixed use development have been identified on the edge of the Primary Shopping Area (defined on the Proposals Map). These developments will support and diversify Crawley's role as a primary regional centre, provide facilities for the new residents, improve the links between different areas of the Town Centre and create a good living and working environment. Developments within this area These sites could accommodate a mix of uses, particularly employment and residential development. The policy identifies a number of suitable general locations for such development but this is not a comprehensive list and others may emerge. Appropriate the uses are indicated for the identified locations that would be expected on these sites to ensure sufficient provision for a balance of uses across the Town Centre. In addition to the identified uses, but others development may also be possible-suitable, such as community or leisure facilities. However, as these areas sites are As this area is located beyond the Primary Main Shopping Area boundary, the only retail provision considered appropriate is convenience retail at on the Haslett Avenue / Telford Place site location. This would meet an identified need without conflicting with the provision of Town Centre North. In appropriate cases Supplementary Planning Documents will be progressed to help bring forward such developments.

15.15 [Delete]

TC2 Mixed use development will be encouraged at suitable locations comprising outworn buildings and under-used land within the Town Centre boundary outside the Main Shopping Area. Such developments will not normally contain any material net gains in retail floorspace. The following sites beyond the Primary Shopping Area boundary are identified as strategic opportunities for mixed use development:

The following broad locations are generally indicated on the Town Centre Inset Map, but this is not a comprehensive list

Main Shopping Area therefore needs to be restricted and controlled, in accordance with Government guidance. Edge of centre or out of centre retailing, ~~Out of town, out of centre or edge of centre retailing~~, including retail warehousing, will only be permitted if need (both quantitative and qualitative) can be proven, the sequential approach has been applied to site identification and it can be demonstrated that the proposal would not have an adverse impact on the Town Centre's vitality and viability. The Council may seek to control the type of goods sold,

## **APPENDIX 1**

### **RECOMMENDED HOUSING TRAJECTORY**

<b>HOUSING REQUIREMENT</b>	2001/02	2002/03	2003/04	2004/05	2005/06	2006/07	2007/08	2008/09	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18
Base annual requirement	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300	300
Built 2001-06 (net)	20	70	103	175	188												
Annual shortfall/surplus																	

## **APPENDIX 2**

[Include the material below as new Appendix 2 in the CS]

### **Part 1 - Regulation 13(5) statement**

Table 1 below fulfils the requirements of Regulation 13(5) of the Town and Country Planning (Local Development) (England) Regulations 2004 by identifying how the policies of the Core Strategy supersede certain policies of the Crawley Local Plan 2000. The legend to the Proposals Map includes indications in brackets (where relevant) of proposals brought forward unchanged from the Local Plan, and the number of the relevant policy.

**Table 5-1: Superseded Local Plan policies ~~Conformity Table~~**

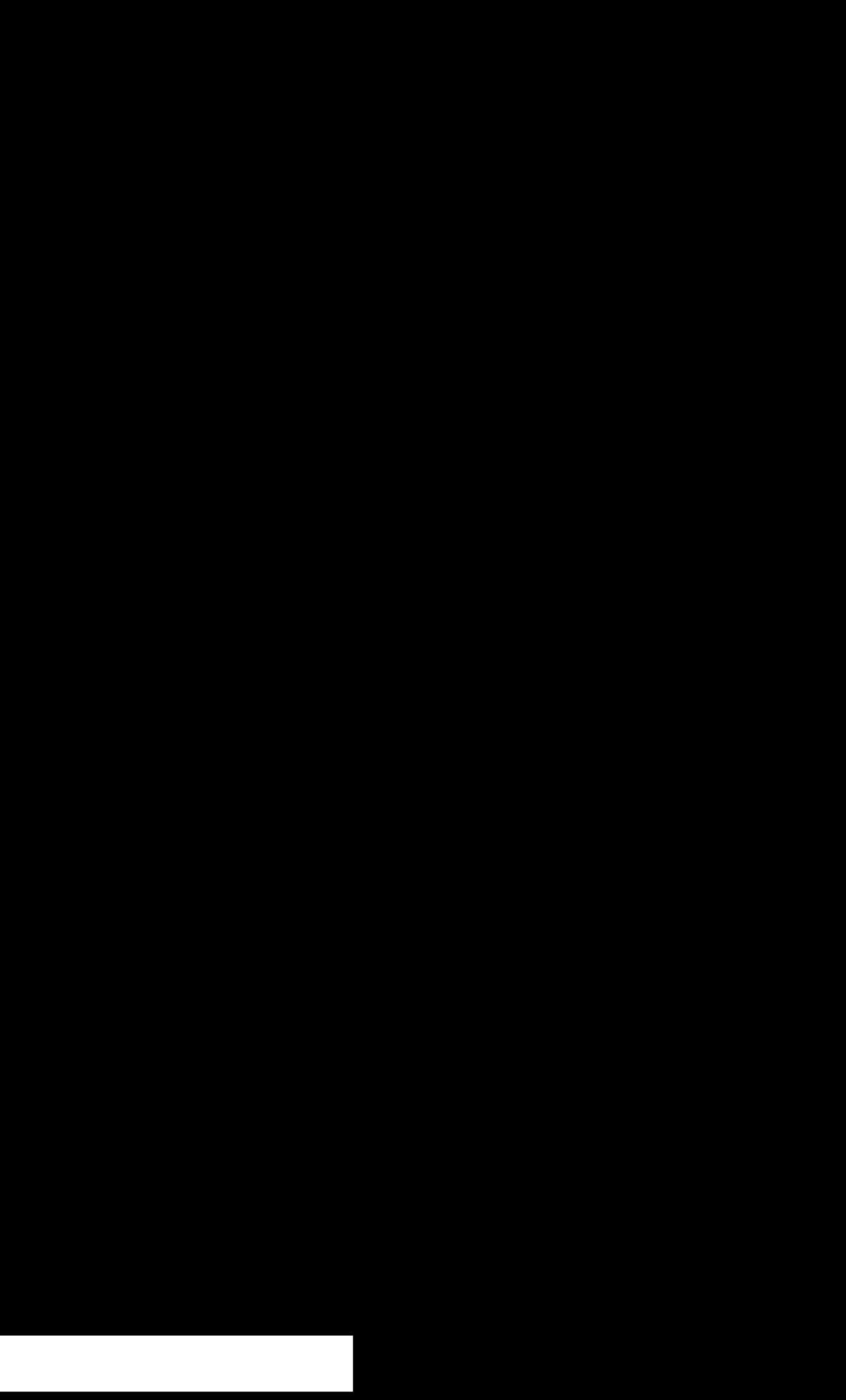
<b>Core Strategy Policy</b>	<b><u>Superseded</u> Local Plan Policy</b>
<b>Core Strategy Chapter 1. Sustainability</b>	
<del>Policy S1 – Achieving Sustainable Development</del>	
<del>Policy S2 – Management of resources and energy efficiency of new development</del>	
<b>Core Strategy Ch</b>	

Policy H1 – Housing provision

	before the completion of an appropriate needs assessment
<b>Core Strategy Chapter 3. Infrastructure and Community Services</b>	
Policy ICS1 – The location and provision of new community and leisure facilities	<p>Chapter 11 Recreation and Leisure, Policies RL1-3 inclusive – <del>Providing Leisure facilities in Crawley</del></p> <p><del>Chapter 11 Recreation and Leisure, Policies RL2 – Providing Leisure facilities in Crawley</del></p> <p><del>Chapter 11 Recreation and Leisure, Policies RL3 – Providing Leisure facilities in Crawley</del></p>
Policy ICS2 – Infrastructure provision	<p>Chapter 12 Community Services, Policies COM1 &amp; 2 – <del>Provision and retention of community services facilities</del></p> <p><del>Chapter 12 Community Services, Policy COM2 – Provision and retention of community services facilities</del></p>
Policy ICS3 – Providing educational needs	
Policy ICS4 – Providing for a new University Campus	
Policy ICS5 – Educational land which becomes surplus	
Policy ICS6 – Providing for primary healthcare needs	

Policy ICS7 – Providing for secondary / higher order healthcare needs







**Core Strategy Chapter 13. Transport corridor between the Town Centre and**

Policy TC7 – Town Centre strategy

Chapter 9, Section 9.1.7.5 201.75 22.25 ref BT 302

## **APPENDIX 3**

Headline  
statement

para 3.1 and I & CS  
Headline  
Statement

objectives para 2.5  
policy H1

objectives para 2.5  
Policies H1, H2,  
H3,H4 and H5  
plus related  
paras

<p>experienced by future generations. Both in terms of their location and design, developments will have been judged against their impact on the environment.</p>	<p>Section 4 headline statement Objectives para 4.1</p>
<p>Structurally the Town will have remained largely unchanged although a new neighbourhood will have been built beyond the Borough Boundaries to the west of the Town and this may have been associated with further development to the north west of the Town. <u>If it is no longer deemed contrary to national policy on London's airports, construction of another new neighbourhood at the North East Sector will have commenced.</u></p>	<p>Objectives 10.6</p>
<ul style="list-style-type: none"> <li>• The Town Centre will have grown significantly to provide a vibrant heart at the centre of the Town – competing effectively within the region and acting as a new town centre 'neighbourhood'</li> <li>• The neighbourhoods, a fundamental feature of Crawley's planning, will have accommodated new housing development but will have retained their overall character; neighbourhood</li> </ul>	<p>Objectives para 15.5</p>

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