REFERENCE NO: CR/2018/0381/FUL

LOCATION: FORMER GAS HOLDER SITE, NORTH OF CRAWLEY AVENUE, POUND HILL, CRAWLEY

WARD:Pound Hill North and Forge WoodPROPOSAL:RETROSPECTIVE APPLICATION FOR CHANGE OF USE OF LAND TO AIRPORT
RELATED PARKING FOR A TEMPORARY PERIOD OF 12 MONTHS AND RETENTION
OF HARD-STANDING AND FENCING

TARGET DECISION DATE: 27 August 2018

CASE OFFICER: Mr T. Nutt

APPLICANTS NAME:J H Treacy Ltd**AGENTS NAME:**PROwe Planning Solutions

PLANS & DRAWINGS CONSIDERED:

PRR1A, Block Plan CBC 01, Location Plan

CONSULTEE NOTIFICATIONS & RESPONSES:-

1.	Environment Agency	No objection subject to condition to provide and manage a 8m buffer zone alongside the watercourse
2.	WSCC Highways	No objection
3.	National Air Traffic Services (NATS)	No objection
4.	Surrey County Council	No comment received
5.	Mid Sussex District Council	No comment received
6.	Mole Valley District Council	No comment received
7.	East Sussex County Council	No comment received
8.	Horsham District Council	No comment received
9.	Tandridge District Council	Comment: No demonstrated clear need for additional airport parking and this use fails to meet the sustainability objectives of the NPPF and other guidance.
10.	Reigate and Banstead Borough Council	Objection: contrary to cross boundary approach between authorities to locate airport related parking to the confines of Gatwick airport.
11.	CBC Drainage Officer	Objection: no information has been provided to indicate how the development mitigates potential increased flooding.
12.	CBC Property Division	Comment: Applicant does not have right of way over access road for the proposed use.
13.	CBC Planning Arboricultural Officer	No comments received
14.	CBC Contaminated Land	No comments received

15. CBC Strategic Planning Team	Objection: Fails to satisfy the requirements of Local Plan Policy GAT3, in relation both to its first and second limbs and as such, should be refused
16. Homes & Communities Agency (HCA)	No comments received
17. Archaeology Officer	Recommend that an archaeological Desk Based
	Assessment is undertaken at the predetermination
	stage.
18. Ecology Officer	No objection subject to conditions requiring suitable
	buffer, lighting mitigation plan and securing
	habitat improvement/creation as part of restoration of
	the site at the end of the proposed use.
19. WSCC Lead Local Flood Authority	No comments received
20. Health & Safety Executive	No Objection
21. GAL Planning Department	Objection: contrary to Local Plan policy GAT3 and
	NPPF promotion of sustainable development.

NEIGHBOUR NOTIFICATIONS:-

A site notice was displayed at the site on 02/08/2018.

RESPONSES RECEIVED:-

No responses received.

REASON FOR REPORTING TO COMMITTEE:-

This application was called in to be determined alongside a major application to the North of the Gas Holder (CR/2018/0312/FUL).

THE APPLICATION SITE:-

- 1.1 The site is situated to the north of the A2011 Crawley Avenue dual carriageway and is accessed from this road via the Crawley Borough Council owned access road. There is a left in-left out junction onto the A2011 from the access road. The site is devoid of vegetation although aerial photos from 2008 show much of the site contained grassland and trees. Except for the areas previously laid to concrete the site has now been laid entirely with road scalpings which extend up to the boundaries of the site.
- 1.2 The site is enclosed by a 2.4m high galvanised palisade fence which retains an access road to the hardstanding area to the north of the gas holder structure which was previously laid to grass and is the subject of a separate planning application (Ref CR/2018/0312/FUL). The gas holder structure, with its associated buildings and hardstanding/parking areas is to the north of and adjacent to the site.
- 1.3 The mature woodland surrounding the site is designated as an area of Structural Landscaping (policy CH7) and the southern woodland adjacent to the site is designated as an area of Ancient Woodland (policy ENV2). The site is within Flood Zone 2 and adjacent to Flood Zone 3b where the Gatwick Stream runs around the eastern boundary of the site.
- 1.4 The site is currently a "meet and greet" airport car-parking operation, with individual passengers vehicles being driven from the airport terminals or hotel by a member of staff and then block parked

at the site whilst the customer flies from Gatwick Airport. The cars are then subsequently returned to the terminal or hotel when the passenger arrives back at the airport.

1.5 The site is surrounded by the Forge Wood neighbourhood development although it is not within the red line of the application site. The surrounding woodlands and field to the north of the gas holder are being retained as a part of this development to provide public open space.

THE PROPOSED DEVELOPMENT:-

- 2.1 This planning application seeks temporary permission for 12 months to use the site for airport related parking as described above. This includes a hard-standing area laid over a significant amount of what was previously grass/vegetation and trees, and a 2.4m high palisade fence around the site. A 2m high green mesh has been attached to most if not all of the existing palisade fence and a narrow native hedge buffer is proposed within and adjacent to the proposed fencing around the boundary of the site. The application states that the site would accommodate 195 cars.
- 2.2 The following documents have been submitted in support of the application:
 - Planning, Design and Access Statement
 - Ecological Walkover Assessment 2013
 - Preliminary Ecological Appraisal 2018

PLANNING HISTORY:-

- 3.1 CR/2016/1050/NCC REMOVAL OF CONDITION 1 (TEMPORARY PERMISSION FOR 3 YEARS FOR THE LAND TO BE USED FOR AIRPORT CAR PARKING) OF PLANNING PERMISSION CR/2013/0299/FUL. Refused. APPEAL SUBMITTED AND DISMISSED 19TH JULY 2018.
- 3.2 CR/2013/0299/FUL RETROSPECTIVE CHANGE OF USE OF LAND TO LONG TERM AIRPORT CAR PARKING FOR A TEMPORARY PERIOD OF 3 YEARS AND RETENTION OF HARD-STANDING (REVISED DESCRIPTION). **PERMIT (NOTE THAT NONE OF THE CONDITIONS WERE COMPLIED WITH)**
- 3.3 CR/019/1988.
 THE ERECTION OF A SERVICE CENTRE, WORKSHOP AND ANCILLARY OFFICES AT THIS SITE.
 REFUSED

PLANNING POLICY:-

- 4.1 <u>National Planning Policy Framework (NPPF 2019)</u>
 - Paragraph 11 The presumption in favour of sustainable development. Plans and decisions should apply a presumption in favour of sustainable development. For decision-taking this means: approving development proposals that accord with an up-to-date development plan without delay. At the heart of the NPPF is a presumption in favour of sustainable development.
 - Section 5 Delivering a sufficient supply of homes. To support the Government's objective of
 significantly boosting the supply of homes, it is important that a sufficient amount and variety of land
 can come forward where it is needed, that the needs of groups with specific housing requirements
 are addressed and that land with permission is developed without unnecessary delay.

- Section 6 Building a strong, competitive economy. Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- Section 9 Promoting Sustainable Transport. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. In assessing specific applications for development, it should be ensured that: a) appropriate opportunities to promote sustainable transport modes can be or have been taken up, given the type of development and its location; b) safe and suitable access to the site can be achieved for all users; and c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree. All developments that will generate significant amounts of movement should be required to provide a travel plan, and the application should be supported by a transport statement or transport assessment so that the likely impacts of the proposal can be assessed.
- Section 12 Achieving well-designed places. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- Section 14 Meeting the challenge of climate change, flooding and coastal change states that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk. Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.
- Section 15 conserving and enhancing the natural environment states that decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the intrinsic character and beauty of the countryside, and minimising impacts on and providing net gains for biodiversity.

4.2 Crawley 2030: The Crawley Borough Local Plan 2015-2030

The plan was adopted on 16th December 2015. Relevant policies include:

- Policy SD1: Presumption in favour of Sustainable Development states that the Council will take a positive approach to approving development which is sustainable.
- Policy CH2: Principles of Good Urban Design in order to assist in the creation, retention or enhancement of successful places. Development proposals will be required among others to create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas, and provide information to demonstrate how the policy principles are achieved through the development.
- Policy CH3: Normal Requirements of All New Development states that all proposals for development should be based on a thorough understanding of the significance and distinctiveness of the site and its wider context and demonstrate how attractive or important features of the site will be retained. These include: views, landmarks, footpaths, rights of way, trees, green spaces, hedges, other historic landscape features or nature conservation assets, walls and buildings. Developments will also need to be of high quality in terms of their urban, landscape and architectural design and relate sympathetically to their surrounds in terms of scale, density, height massing, orientation, views, landscape, layout, details and materials. Development should also provide/retain a good standard of amenity for future occupants and not cause unreasonable harm to the amenity of the surrounding area, including through traffic generation and general activity. Development should demonstrate compliance with Secured by design and meet the requirements for its safe and proper

use, in particular in regard to access, circulation and manoeuvring and in this case vehicle parking. Individual or groups of trees that contribute positively to the area should be retained and where any are lost replacement tree planting should accord with the standards set out in policy CH6.

- Policy CH4: Comprehensive Development and Efficient use of Land: Development proposals must use land efficiently and not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development.
- Policy CH6: Tree planting and replacement standards sets out that where development would result in the loss of trees these should be identified and replaced to mitigate the visual impact from the loss of canopies. The requirement for replacement trees is based on the size of the trees to be lost and this is expected to take place on site or be subject to commuted payments for planting elsewhere.
- Policy CH7: Structural Landscaping states that areas of soft landscaping that make an important contribution to the town and its neighbourhoods should be protected and if appropriate enhanced.
- Policy H2: Key Housing Sites, identified Forge Wood as a deliverable location for 1900 dwellings and it is also includes the residual land at Forge Wood, as one of a number of broad locations for *"housing development in years 6–10 and 11–15 with the capacity to deliver a minimum of 156, 150 and 171 net dwellings respectively.*
- Policy EC1 'Sustainable Economic Growth' states that Crawley's recognised role and function as the key economic driver for the Gatwick Diamond will be protected and enhanced and the established role of Manor Royal as a key business location for B Use classes is to be protected and ensure that the town's Main Employment Areas are the focus for sustainable economic growth.
- Policy ENV1 Green Infrastructure. This Policy states that Crawley's multi-functional green infrastructure network will be conserved and enhanced through various measures including protection, enhancement and integration with new development, mitigating harm and maintaining and extending links where possible, including through larger proposals.
- Policy ENV2 Biodiversity, All development proposals will be expected to incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features. Habitat and species surveys and associated reports will be required to accompany planning applications which may affect...sites showing likely ecological value based on past ecological surveys.
- Policy ENV8 Development and Flood Risk states development proposals must avoid areas which are exposed to flooding and must not increase the risk of flooding elsewhere.
- Policy ENV10 Pollution Management and Land Contamination. Development must not result in a significant increase in levels of pollution or hazards unless the impacts can be mitigated.
- Policy ENV12 Air Quality states that development proposals that do not result in a material negative impact on air quality will normally be permitted. In all relevant cases, development that cannot demonstrate how material negative air quality impacts will be mitigated may be refused.
- Policy IN3 Development and requirements for sustainable transport states that development should be concentrated in locations where sustainable travel patterns can be achieved. In addition, developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased congestion or highway safety. Where appropriate, Transport Statements or Transport Assessments will be required.
- Policy IN4 Car and Cycle Parking Standards. Development will be permitted where the proposals provide the appropriate amount of car and cycle parking to meets its needs.
- Policy GAT3 Airport Related Parking. The Provision of additional or replacement airport parking will
 only be permitted within the airport boundary. All new proposals must be justified by a demonstrable
 need in the context of proposals for achieving a sustainable approach to surface transport access to
 the airport.

The Green Infrastructure SPD expands upon the Local Plan Character and Environmental Policies. It includes guidance on identifying the characteristics and green assets within or close to sites, including water courses, flood zones and specific environmental/heritage designations. Part 3 of the guidance relates to trees with paras 3.38- 3.42 providing specific advice on protecting Ancient Woodland and Veteran Trees.

4.4 Gatwick Airport Surface Access Strategy 2018

The 2018 ASAS sets out new targets including achieving 48% public transport mode share for airport passengers by 2022 under the scrutiny of the Transport Forum Steering Group (which CBC and WSCC are members of) and to deliver a reduction in air passenger "Kiss & Fly" car journeys equivalent to at least 10% of its 2017 mode share by 2022 (page 14). The 17 actions to achieve these targets include continuing to meet Section 106 obligations in respect of local planning policy (GAT3) and consideration of measures to reduce Kiss and Fly. On car parking "Our focus is to provide a parking strategy taking into account the relationship over time between passenger numbers, mode share, and parking capacity (provided on and off-airport) to ensure adequate capacity and choice is provided while working to achieve our mode share targets" (page 39). Page 40 of the ASAS confirms demand can be catered for on-airport over the next 5 years and summarises the projects to deliver this capacity.

4.5 Gatwick Airport Master Plan 2019

The Gatwick Airport Master Plan 2019 sets out three growth scenarios: the airport remaining as a single runway, one where the existing standby runway is used together with the existing main runway, and one where land is safeguarded for an additional runway to the south. In relation to car parking the master plan reiterates the longstanding approach of accommodating future demand growth on-airport while seeking to achieve mode share targets for each scenario. It sets out the projects to deliver enough parking (9,565 spaces) to meet the forecast increase in demand to 2023 as passenger numbers grow allowing for any changes to mode share.

4.6 Gatwick Airport S106 Legal Agreement (2019)

A legal agreement was entered into on 30th April 2019 between Gatwick Airport Ltd (GAL), Crawley Borough Council and West Sussex County Council. It contains various obligations on GAL including on car parking and mode share. It contained provision on surface access in schedule 5. The Airport is required to maintain a "surface access strategy" ("SAS") (Obligation 5.2) as a means to improve the sustainability of surface travel to and from the airport; to use levies generated from on-site parking to subsidise public transport initiatives (para 5.3) and to "provide sufficient but no more" car parking spaces to achieve a combined on and off airport supply of spaces that would be appropriate for a 48% non-car mode share (clause 5.6.1).

PLANNING CONSIDERATIONS:-

- 5.1 As Policy GAT3: Airport Related Parking is the specific policy for airport related parking, the main consideration in the determination of this application is whether the principle of a change of use of this land outside the airport boundary to off-airport parking is acceptable.
- 5.2 The planning considerations are:
 - The principle of the change of use to airport related parking;
 - The impact on visual amenity and the character of the area;
 - The impact upon the operation and safety of the Highway;

- Flooding, drainage, pollution and contamination of the watercourse;
- The impact on ecology
- 5.3 The relevant policy for airport parking proposals is GAT3: Airport Related Parking which states "The Provision of additional or replacement airport parking will only be permitted within the airport boundary. All new proposals must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport". The policy clearly states that all additional or replacement airport related car-parking must be on-airport. Given that the current position is that there is no lawful use of any of the site as a Gatwick related car park, a planning application which proposes off airport parking in this location is in direct conflict with the first limb Policy GAT3 – which was adopted after full consideration of relative sustainability of on and off airport parking. It is therefore considered that proposed airport related car-parking at this site is not on airport, it is contrary to Local Plan policy GAT3. Beyond stating that there is a need for airport parking, the applicant has not submitted any information to justify why this off airport location is needed for airport parking. The recent appeal against the refusal of proposed airport parking on this site was the subject of a public inquiry and was subsequently dismissed (Ref APP/Q3820/W/17/3182041). The inspector in his decision stated "there is no evidence to suggest that there is an unmet need that must be met by allowing off-airport parking. I conclude on the first issue that the scheme would conflict with both limbs of Policy GAT3 of the Local Plan" It is clear therefore that airport parking in this location is unacceptable in principle. The view of this Inspector in regard to the interpretation and application of GAT3 was further reinforced by the Inspectors appeals decisions for both the Southways (APP/Q3820/W/16/3164808) and Lowfield Heath Service Station (APP/Q3820/W/17/3173443) in 2018.

The impact on visual amenity and the character of the area

- 5.4 The application site lies within a much larger area identified on the Local Plan Map as a Key Housing Site (Policy H2). However, the 'broad locations' for housing do not include the application site. In addition, the approved Forge Wood Master Plan (North East Sector Crawley) shows the site as 'white land' (not identified for development as a part of the delivery of the Forge Wood neighbourhood), as does the Landscape Management Areas Plan submitted as part of the development proposals for the mixed use neighbourhood. It is therefore considered that the proposal would not prejudice the delivery of the 1,900 dwellings identified in Policy H2 of the Local Plan.
- 5.5 The gas holder currently dominates the site. Whilst not currently in operation, there are no current plans to remove it and the site falls within a HSE Major Hazard Zone which makes unsuitable for housing with the gas holder still in situ.
- 5.6 In terms of character, the site was historically in use as part of the larger gas holder site with part of the site grass and part hardstanding with the access road located on the south and west boundary of the site. The site now comprises hardstanding and road-scalpings on areas that were previously laid to grass. It is now devoid of vegetation and enclosed by a 2.4m galvanised palisade fence. Gatwick Stream runs along the eastern boundary, and there is woodland to the east, west and south of the site. The site is largely self-contained and is not visible in wider views, and the parked cars are not especially prominent in the wider landscape. It is screened from the newly constructed houses 240m to the north and 70m to the east by mature woodland.
- 5.7 It is considered that the proposal would not prejudice the principles established for the Forge Wood Neighbourhood and whilst it would alter the character of the site it would not harm the character or

appearance of the wider area. It is therefore in accordance with Crawley Local Plan Policies CH1, CH3 and Policy H2 in this regard.

The impact upon the operation and safety of the Highway;

- 5.8 The existing access, parking and turning arrangements would remain unchanged. Access is shared with anglers who use the path that spurs off to the left of the entrance road and links the fishing lake to the access road.
- 5.9 A technical note has been submitted by the applicant which considers the impact that the car park operations may have on the local highway network. It concludes that the level of traffic generation has a negligible effect on the operation of the local highway network and that the existing site and access arrangements are appropriate for the type of operation that is presently taking place on site.
- 5.10 The site has been considered by West Sussex County Council Highways Department. The access to the site is from the A2011 Crawley Road, a dual carriageway with a 70mph speed limit. The access is suitable for vehicles to enter and exit the carriageway with good forward visibility and as such the infrastructure in place accommodates the proposed use. The site is not used by any other traffic, although there is a pedestrian access into an angling fishing lake which may see some traffic. In summary WSCC raise no objection to the retrospective proposal on highway safety or capacity grounds.

Flooding, drainage and pollution and contamination of the watercourse;

- 5.11 The whole site is within a Zone 2 flood risk area and adjacent to the site on the eastern boundary is a Flood Zone 3b area where the Gatwick River lies. Policy ENV8: Development and Flood Risk requires that where the development location is situated in an area identified as being at risk of flooding, a Flood Risk Assessment is required that demonstrates how appropriate mitigation measures will be implemented as part of the development to ensure risk is made acceptable on site, and is not increased elsewhere as a result of the development. A Flood Risk Assessment has not been submitted with this proposal. No information has been provided to indicate how the development mitigates potential increased flooding off site due to encroachment on the flood plain (& the potential need for compensatory storage), nor the increased rate of run off generated by the change of use from green field land to hardstanding (& the potential need to provide attenuation storage), and potential changes to flood routing caused by the development as a result of topographical changes. As no information has been provided as required by Policy ENV8 there is no certainty that the proposal is acceptable in relation to flood risk. It is therefore considered that the proposal is contrary to Crawley Borough Local Plan policy ENV8: Development and Flood Risk.
- 5.12 The applicant has not provided any details of the measures to be taken to prevent contamination of the adjacent water course. Notwithstanding that the Environment Agency has not commented on these issues in relation to the current proposals and there was not previously an objection to the hardstanding from the Environment Agency. These matters were addressed in the original application for temporary permission ref CR/2013/0299/FUL. Condition 5 of that application required petrol/oil interceptors to be installed throughout the site in accordance with details that have first been submitted to and been approved in writing by the Local Planning Authority. No condition discharge applications were made and as far as the LPA is aware no works have been undertaken to address these issues. Any permission here would therefore include a condition to provide petrol/oil interceptors to prevent pollution of the local watercourse in accordance with policy ENV10 of the Crawley Borough Local Plan although given the previous history of the site and lack of objections on flood risk grounds it is not considered that it would be reasonable to refuse the application on flood risk grounds.

The impact on ecology

- 5.13 The site is devoid of vegetation although aerial photos from 2008 show much of the site previously contained grassland and trees. The site is encompassed by mixed broadleaf woodland with the woodland adjacent to the south designated as ancient woodland. The Gatwick stream is located outside the site 2/3 metres from the eastern boundary.
- 5.14 Local Plan Policy ENV2: Biodiversity states that habitat and species surveys and associated reports will be required to accompany planning applications which may affect Habitats of Principal Importance under S.41 of the NERC Act 2006). The site is adjacent to a major river which is a habitat of principal importance.
- 5.15 An ecological report has been submitted with the application which recommends measures to mitigate lighting impacts and the installation of bat boxes and bird boxes within the surrounding woodland.
- 5.16 The submitted block plan proposes a narrow 'native hedge buffer' into the site from the fence boundary. The Environment Agency have commented on the application stating that they have no objection providing a condition is imposed on any permission that requires the provision and management of an 8 metre buffer zone alongside the watercourse submitted to and agreed by the local planning authority. To protect the Ancient woodland a buffer zone will also be required around the other boundaries adjacent to trees this should be at least 15m although consideration will be given to the historic location of the road within the site. By introducing buffer zones, the river corridor and ancient woodland would be maintained to support wildlife movement and shield these ecologically sensitive areas from noise and pollution. Bankside vegetation will further promote bank stability and help prevent erosion. The council's ecology adviser has commented that should a suitable 8m buffer be included in accordance with EA advice the proposal would be compliant with biodiversity policies. The previous temporary permission included a condition requiring the removal of hardstanding, fencing and lighting to create a buffer area 8m in length from the top of the bank of Gatwick Stream planted with locally native species within 6 months of permission. It should be noted that this condition was not complied with as no hardstanding has been removed or buffer created within the past 5 years.
- 5.17 The ecology adviser has suggested that any permission should also include a lighting mitigation plan to show how light pollution of adjacent habitats, particularly the Gatwick Stream corridor, would be mitigated. Any permission should therefore include conditions requiring a lighting mitigation plan, installation of bird/bat boxes. The opportunity should also be taken to secure habitat improvements / creation (eg. Woodland creation) as part of restoration of the site at the end of the proposed use.
- 5.18 The application is for a 12 month temporary use. The site has operated in non-compliance with a condition requiring the provision and management of the buffer zones. There is a doubt given the history of the site that such a condition would be complied with or if it, is in a timely manner, and even if implemented it would provide little impact prior to any permission expiring after one year. It would however over time provide an increasing benefit if retained after implementation and the use ceases. It is considered that such measures should have been implemented previously and already form part of this proposal. Nevertheless, any permission should include this condition with a 3 month period for compliance from the date of the permission.
- 5.19 To ensure that the site is returned to its former use, any permission should also include a condition that requires the hardstanding be removed and the land restored to a condition that has first been agreed with the LPA. This would be likely to include the retention of the buffer areas.

5.20 The proposal is therefore considered on balance not to conflict with Local Plan Policy ENV2: Biodiversity, subject to the above conditions.

The impact on archaeology

5.21 The site is located within an archaeological notification area - Medieval Iron Working and Settlement Site. The Surrey County Council Heritage Conservation Team have been consulted and request that an archaeological desk based assessment which considers all available resources, including the impact of the retrospective planning application, is undertaken at the predetermination stage and submitted as part of the retrospective planning application. This requirement is set out in paragraph 189 of the NPPF: "Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation." This has not been submitted by the applicant and therefore it is not possible to reach an informed judgment of the impact the proposal has had on heritage assets of archaeological interest. It is noted however, the works have already taken place and this issue was not raised in the previous temporary permission or at the recent appeal on the site, it can therefore be accorded only very limited weight in the planning balance in regard to this decision.

CONCLUSIONS:-

6.1 The planning application, which proposes off airport parking is in direct conflict with Policy GAT3 as the policy requires airport parking to be on-airport and it is recommended that the application be refused on this basis.

RECOMMENDATION RE: CR/2018/0381/FUL

REFUSE - For the following reason:-

- 1. The development by virtue of its siting at an off-airport location is unsustainable and contrary to policy GAT3 of the Crawley Borough Local Plan 2015-2030.
- 1. NPPF Statement

In determining this planning application, the Local Planning Authority assessed the proposal against all material considerations and has worked with the applicant in a positive and proactive manner based on seeking solutions where possible and required, by:

• Liaising with the agent and discussing the proposal where considered appropriate and necessary in a timely manner during the course of the determination of the application.

• Seeking amended plans/additional information to address identified issues during the course of the application.

• Informing the applicant of identified issues that are so fundamental that it has not been/would not be possible to negotiate a satisfactory way forward due to the harm that would be/has been caused.

This decision has been taken in accordance with the requirement in the National Planning Policy Framework, as set out in article 35, of the Town and Country Planning (Development Management Procedure) Order 2015.

