

REFERENCE NO: CR/2017/0346/OUT

LOCATION: [LAND NORTH OF TILGATE FOREST BUSINESS CENTRE, FOREST GATE, BRIGHTON ROAD, TILGATE, CRAWLEY](#)

WARD: Tilgate

PROPOSAL: OUTLINE APPLICATION (ACCESS & LAYOUT), FOR ERECTION OF TWO FOUR-STOREY RESIDENTIAL BUILDINGS, COMPRISING 80 ONE AND TWO BEDROOM FLATS, WITH CAR PARKING AT UNDERCROFT AND SURFACE LEVEL AND COMMUNAL PRIVATE AMENITY SPACE

TARGET DECISION DATE: 25 July 2017

CASE OFFICER: Miss D. Angelopoulou

APPLICANTS NAME: Lamron Developments (Tilgate) Ltd

AGENTS NAME: Bell Cornwell LLP

PLANS & DRAWINGS CONSIDERED:

17/10/2017, 15.520.L.001 Rev B Site Location Plan
21/04/2017, 15.520.P.001 Existing Survey (Levels)
25/04/2017, 15.520.P.002 Rev A Proposed Site Layout
21/04/2017, 15.520.P.003 Proposed Site Layout & Site Elevation (Illustrative)
21/04/2017, 15.520.P.004 Proposed Floor Layouts (Sheet 1) (Illustrative)
21/04/2017, 15.520.P.005 Proposed Floor Layouts (Sheet 2) (Illustrative)
21/04/2017, 15.520.P.006 Elevation Block 01 (Illustrative)
21/04/2017, 15.520.P.007 Elevation Block 02 (Illustrative)
21/04/2017, 15.520.P.008 Proposed Elevations & Site Section (Illustrative)
21/04/2017, 15.520.P.009 Existing Survey (Hard Standing Area)
21/04/2017, 16050-S20 Site Survey
21/04/2017, 706/01 Indicative Landscape Strategy
21/04/2017, 1002-01 Tree Protection Plan
29/11/2017, 5681.002A - Proposed Footway Cycleway Improvements

CONSULTEE NOTIFICATIONS & RESPONSES:-

- | | | |
|----|--------------------------------------|---|
| 1. | GAL - Aerodrome Safeguarding | The proposal could conflict with aerodrome safeguarding unless conditions requiring landscaping scheme and SUDS details are imposed. There also needs to be a cranes informative. |
| 2. | Environment Agency | No comments to make; application to have a low environmental risk. |
| 3. | WSCC - Highways | No objection to the proposal and revised Travel Plan subject to conditions and a S106 agreement for a pedestrian/cycleway link. |
| 4. | National Air Traffic Services (NATS) | No safeguarding objection. |
| 5. | Thames Water | No objection subject to informative. |
| 6. | Sussex Building Control Partnership | No response received. |
| 7. | Natural England | No objection; issues for Ancient Woodland, |

8.	Police	protected species should be dealt with the relevant Standing Advice. Comments regarding access control system and postal arrangement.
9.	CBC - Drainage Officer	No objection; SW Drainage Strategy at this stage is generally comprehensive.
10.	West Sussex Fire Brigade	No response received.
11.	CBC - Housing Enabling & Development Manager	No objection.
12.	CBC - Planning Arboricultural Officer	No objection subject to conditions.
13.	UK Power Networks	No response received.
14.	CBC - Environment Team	Comments; upgrade to the footway and link to K2 cycle path, that land take should be minimised and green infrastructure maximised for.
15.	CBC - Contaminated Land	No objection subject to condition to provide a new risk assessment in relation to residential proposal.
16.	CBC - Environmental Health	Objection; a noise survey of impact from adjoining commercial units and A23 road should be provided.
17.	Cycle Forum	Comments regarding the suggestion to upgrade the footway and link to K2 cycle path.
18.	The Woodland Trust	No response received.
19.	CBC - Refuse & Recycling Team	Comments; adequate location for bins, but no information regarding size and capacity of the bin stores.
20.	Southern Water	No objection subject to informative for a formal application.
21.	CBC - Forward Planning: Energy Efficiency & Sustainability	No objection subject to condition for a sustainability statement.
22.	CBC - Forward Planning: Retail & Employment	Objection; the proposal has failed to demonstrate that EC2 criteria have been met.
23.	CBC - Forward Planning: Urban Design	Objection; the scheme would not be sustainable and would provide poor level of connectivity and poor definition of public realm.
24.	CBC - Forward Planning: Countryside & Open Space	Following additional surveys, no objection is raised, but still issues with car parking encroaching into the SNCI that is not acceptable.
25.	Archaeology Officer	No objection subject to condition for implementation of a programme of archaeological work.
26.	Ecology Officer	Following additional surveys, no objection is raised subject to condition for appropriate mitigation of Ancient Woodland and protection of protected species as suggested.
27.	WSCC - Surface Water Drainage (SWD)	No objection subject to conditions.
28.	NHS Crawley Clinical Commissioning Group	No objection; will consider a CIL bid if planning approval.

NEIGHBOUR NOTIFICATIONS:-

Tilgate Forest Business Centre

KPMG LLP (1 Tilgate Forest Business Centre), OCS GRP Ltd (4 Tilgate Forest Business Centre).

The application has also been advertised through two adverts in the local press (one as major development and one as departure from the local plan) on 10/05/2017 and 14/07/2017 and two site notices displayed in front of the site on 03/05/2017 and 19/07/2017.

RESPONSES RECEIVED:-

Three letters of representation have been received raising objections to the proposal on the following grounds:

- There appears to be very little consideration given to active travel (walking, cycling) in this planning application. Given the relatively close distance to the centre of town or to public transport (at the K2 leisure centre), further consideration should be given to access issues and potentially a reduction in the amount of parking provided.
- Housing should not be allowed in this part of Crawley and the business construction should not have been allowed in the past. Crawley is already overcrowded town with very few green areas left.
- With the introduction of 80 resident flats with 110 parking spaces, the existing access arrangements would need to be looked into in the planning stage to review the access and egress into the adjacent business units due to congestion.

In addition, comments were provided from the adjoining office regarding the proposed programme for the construction phase, mitigation of dust into their plant and the proposed refuse area to be securely stored.

A strong objection report has also been submitted from occupiers within Tilgate Forest Business Centre. In summary, the objections are summarised as follows:

- The proposal is considered contrary to economic growth and character policies within the adopted Crawley Local Plan 2015 policies and relevant National Planning Policy Framework.
- The proposed use in principle is inappropriate by virtue of the introduction of the residential development on land protected for employment use.
- With economic land supply severely constrained in the Borough, the economic function of Tilgate Park Business Centre should continue to be protected given its continued suitability and function as an employment area. The potential loss of employment land for residential use contravenes this policy and would have an adverse impact on both current and future potential employment use and investment.
- Given the increasing demand and scarcity of employment land opportunities within Crawley Administrative Boundary, whilst the site was deemed 'unsuitable' previously for specific occupier requirements this does not mean that the site's economic potential will remain unrealised. Therefore, the retention of the 0.88ha site with potential for 4650sqm employment floor space should be maintained as opposed to allowing its permanent loss to residential use.
- The site is isolated by virtue of its location, and the suitability for residential use is also contested.
- The area currently provides floorspace for globally focused Business Park tenants, and the introduction of residential use, traffic and noise to the site may be a motivation to move to other more suitable locations across the town or outside of Crawley.
- This may also act as a deterrent to any further investment, in the existing properties, and therefore the economic function of the Main Employment Area would be further undermined in the short to medium term.

REASON FOR REPORTING TO COMMITTEE:-

The application is 'major' development and approval would be a departure from the Local Plan.

THE APPLICATION SITE:-

- 1.1 The application site comprises 0.9 hectares of vacant and cleared land at a site formerly known as Tilgate Pallets but now part of Tilgate Forest Business Centre. Tilgate Forest Business Centre lies to the east of Pease Pottage Hill on the A23 between Crawley and Pease Pottage and was formerly the site of a timber yard and pallet making factory but, following a series of planning permissions beginning in the 1980's, the majority of the Business Centre has been redeveloped for offices. There are currently 4 free-standing offices on the Business Centre plus the vacant land the subject of this application. These offices plus the vacant land, with associated car parking and landscaping, comprise the Tilgate Forest Business Centre. Vehicular access to the site is by way of a junction with the A23, created at the time of the original permission, and is known as Forest Gate (a private road).

- 1.2 The application site has been cleared of buildings and largely comprises a series of concrete slabs from the previous use, plus small areas of cleared ground. The level slope significantly down on the eastern side of the site. There are no major trees within the main body of the development site, but there are mature trees along the site boundaries to the north, east and west of the site. The site is constrained by protected trees (TPO ref: 16.11.1) to the west, adjacent to A23, and a Site of Nature Conservation Importance (SNCI). The SNCI designation affects the site at the eastern and western end and wraps around Tilgate Forest Business Centre. The extreme eastern corner of the application site also contains an area of Ancient Woodland. The Council's GIS mapping system identifies the site as contaminated land and to the north and east is an Archaeological Area related to Tilgate Forest.
- 1.3 The site lies within the Tilgate Forest Business Centre Main Employment Area defined by Policy EC2 of the Crawley Borough Local Plan 2015-2030. The site also contains Ancient Woodland and is a Site of Nature Conservation Importance, as set out in Policy ENV2. The site is within the Long Distance View Splay from Buckswood Drive as identified by the Local Policy CH8. The site is also identified as Structural Landscaping as set out in Policy CH7. It should be noted that small parts to the east and west of the application site are outside the built-up area as identified by Policy CH9.
- 1.4 To the north of the site the majority of the boundary comprises a dense area of Ancient Woodland. To the north west corner there is a house and garden which faces the A23 (No.3 Pease Pottage Hill). To the south of the site lie the other office buildings, the access and their car parking facilities. These offices are 2 & 3 storeys in height. The site itself is well screened by trees and buildings.

THE PROPOSED DEVELOPMENT:-

- 2.1 The application seeks outline planning permission for the erection of two four-storey residential buildings, comprising 80 one and two bedroom flats, with associated car parking at undercroft and surface level and areas of communal private amenity space. As this application is for Outline Planning Permission, the applicant requests that only access and layout are assessed and all other matters (scale, appearance and landscaping) are considered at the Reserved Matters stage. The application is however accompanied by a full set of illustrative floor plans and elevational plans for all the buildings and drawings indicating the proposed appearance of the proposal. Other supporting documents include:-
- Design and Access Statement
 - Planning Statement
 - Transport Statement & Residential Travel Plan
 - Arboricultural Impact Assessment
 - Ecological Appraisal
 - Reptile Survey
 - Flood Risk Assessment
 - Energy and Sustainability Planning Report
 - Environmental Site Assessment
 - Landscape Visual Impact Assessment
 - Utilities Statement
 - Marketing Report [Appendix 2 of the Planning Statement].
- 2.2 The layout of the proposal shows that the existing access from Forest Gate would be utilised. It should be noted that the red line on the location plan has been amended to include the private road of Forest Gate from the application site to the A23 junction and notice was served on the relevant owners. A pedestrian / cycleway link from Tilgate Forest Business Centre to connect with the existing cycleway network at K2 Leisure is also proposed as part of the proposal by widening the existing footway and cycleway to 3m. The development would comprise two block of flats, one either side of the existing access. Block 1, to the west of the access road, would be between 7-10 metres from the northern boundary and the Ancient Woodland. Block 2, to the east of the access road, would be between 5-8 metres from the northern boundary and the Ancient Woodland. There would be a 15m separation distance between the 2 blocks.

- 2.3 Block 1 would comprise a total of 48 apartments (29x 1-bed flats and 19x2-bed flats). Block 2 would comprise a total of 32 apartments (13x1-bed flats and 19x2-bed flats). The total number of residential units proposed would be 80 units with Block 2 providing affordable housing comprising 40% of the total units on the site. Communal amenity space would be provided to the side of both new buildings.
- 2.4 The car parking arrangement would provide a total of 110 car parking spaces, including 4 disabled spaces, to the east and west of the application site. Block 1 would have 13 cars in an undercroft area to the east and Block 2, due to the existing sloping topography to the east of the site, would also provide 4 undercroft parking spaces. A cycle parking and refuse storage is also proposed to the west of the access road.
- 2.5 The illustrative elevations show that the proposed buildings would have pitched tiled roofs. The materials for the walls would comprise brick and render and there would be Juliet balconies.
- 2.6 It should be noted that, following objections raised from officers over the loss of the employment site, impact on the Ancient Woodland and ecology issues, the applicant submitted some additional documents in support of the application as following:
- Amphibian survey.
 - Bat Survey.
 - Ecological Assessment and Review.
 - External Lighting Report.
 - Development Appraisal.
 - Supplementary Report in relation to Policy EC2 (July 2017).
 - Supplementary Report from Stiles Harold Williams in relation to viability assessment (December 2017).

PLANNING HISTORY:-

- 3.1 CR/1994/0633/FUL – Erection of 3 storey office development with associated parking – Permit (3571sqm).
- 3.2 CR/1995/0636/FUL – Erection of new 2 storey office development with associated parking – Permit (3446sqm).
- 3.3 CR/2006/0314/FUL – Erection of two office buildings with associated parking & landscaping– Withdrawn (4630 sqm – three storey).
- 3.4 CR/2006/0607/FUL – Erection of 2 office buildings with associated parking and landscaping – Permit (4630 sqm – three storey).
- 3.5 CR/2010/0182/FUL – Extension of time limit for CR/2006/0607/FUL: erection of 2 office buildings with associated parking and landscaping – Permit.
- 3.6 CR/2013/0423/FUL – Extension of time limit for CR/2010/0182/FUL: erection of 2 office buildings with associated parking and landscaping – Permit. On 20th November 2013 for 5 years, extant permission – expires 20th November 2018.

PLANNING POLICY:-

National Planning Policy Framework (2012) (NPPF)

- 4.1 The NPPF states that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. More specifically:

- Paragraph 14 – Presumption in favour of sustainable development. At the heart of the NPPF is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.
- Paragraph 17 – Core planning principles. Always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings.
- Section 1 – Building a strong, competitive economy. The Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Planning should operate to encourage and not act as an impediment to sustainable growth. Therefore significant weight should be placed on the need to support economic growth through the planning system. To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century. In drawing up Local Plans, local planning authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth.
It also states that planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.
- Section 6 – Delivering a wide choice of high quality homes. This seeks to significantly boost the supply of housing. Applications should be considered in the context of the presumption in favour of sustainable development and are to deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.
- Section 7 – Requiring good design. The Government attaches great importance to the design of the built environment. Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.
- Section 11 – Conserving and enhancing the natural environment. When determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:
 - if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;
 - development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;
 - opportunities to incorporate biodiversity in and around developments should be encouraged;
 - planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Crawley Borough Local Plan (2015-2030) (adopted December 2015)

4.2 The relevant policies include:

- Policy SD1: Presumption in Favour of Sustainable Development. In line with the planned approach to Crawley as a new town and the spatial patterns relating to the neighbourhood principles, when considering development proposals the council will take a positive approach to approving development which is sustainable.
- Policy CH1: Neighbourhood Principle will be protected and enhanced by maintaining the neighbourhood structure of the town with a clear pattern of land uses and arrangement of open spaces and landscape features.
- 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 respond to and reinforce locally distinctive patterns of development and landscape character and protect and/or enhance heritage assets and create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas.
- Policy CH3: Normal Requirements of All New Development states all proposals for development will be required to make a positive contribution to the area; be of a high quality urban design; provide and retain a good standard of amenity for all nearby and future occupants of land and buildings; be able to meet its own operational requirements necessary for the safe and proper use of the site; retain existing individual or groups of trees; incorporate “Secure by Design”

principles and demonstrate how the Building for Life 12 criteria would be delivered. Development proposals must adhere to any relevant supplementary planning guidance produced by the council.

- 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 over a wider area.
- Policy CH5: Standards for all New Dwellings states that new dwellings must create a safe, comfortable and sustainable living environment and sets out minimum sizes for each dwelling, which is based on the Nationally Described Space Standards.
- Policy CH6: Tree Planting and Replacement Standards. Landscape proposals for residential development should contribute to the character and appearance of the town by including at least one new tree for each new dwelling, of an appropriate species and planted in an appropriate location. Where development proposals would result in the loss of trees, applicants must identify which trees are to be removed and replaced in order to mitigate for the visual impact resulting from the loss of the tree canopies.
- Policy CH7: Structural Landscaping requires that development proposals should protect and/or enhance areas of structural landscaping.
- Policy CH8: Important views. The Important Views identified on the Local Plan Map should be protected and/or enhanced and development proposals should not result in a direct adverse impact or lead to the erosion of these views. The site is within the Long Distance View Splay from Buckswood Drive.
- Policy CH9: Development outside the Built-Up Area. To ensure that Crawley's compact nature and attractive setting is maintained, development should meet all the criteria set out in this Policy. In particular, for Tilgate/Worth Forest and Fringes: Proposals within Tilgate Country Park and Worth Conservation Area/Worth Way SNCI should conserve their high landscape value and potential for improved green infrastructure links to other areas.
- Policy CH12: Heritage Assets. All development should ensure that Crawley's designated and non-designated heritage assets are treated as a finite resource, and that their key features or significance are not lost as a result of development.
- Policy EC1: Sustainable Economic Growth. Crawley's role as the key economic driver for the Gatwick Diamond will be protected and enhanced. To ensure that Crawley's recognised economic role and function is maintained and enhanced the council will ensure that the town's Main Employment Areas are the focus for sustainable economic growth. Opportunities for approximately 23ha of employment land are identified within the Borough, meeting short-term economic growth needs for the town over the early part of the Plan period. As a minimum, an additional 35ha of land for business uses is required in order to secure future economic growth at Crawley.
- Policy EC2: Economic Growth in Main Employment Areas. Proposals that would involve a net loss of employment floorspace in any Main Employment Area, including Manor Royal, Gatwick Airport and Crawley Town Centre, will only be permitted where they are able to demonstrate that:
 - i. the site is no longer suitable, viable or appropriate for employment purposes; and
 - ii. the loss of any floorspace will result in a wider social, environmental or economic benefit to the town; and
 - iii. there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.
- Policy EC4: Employment Development and Residential Amenity. Where residential development is proposed within or adjacent to Main Employment Areas, the principal concern will be to ensure that the economic function of the area is not constrained.
- Policy H1: Housing Provision. The council will positively consider proposals for the provision of housing to meet local housing needs.
- Policy H3: Future Housing Mix. All housing development should provide a mix of dwelling types and sizes to address the nature of local housing needs and market demand. The appropriate mix of house types and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme.
- Policy H4: Affordable and Low Cost Housing. 40% affordable housing will be required from all residential developments. In addition to the provision of 40% affordable housing, approximately 10% low cost housing will be sought on developments proposing 15 dwellings or more, offering up to 10% discount to first-time buyers.

- 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 of nature conservation value within and around the development. It sets out a hierarchy biodiversity sites and states that the areas listed will be conserved and enhanced where possible. These are:
 - “1. Nationally designated sites:
 - *Sites of Special Scientific Interest*
SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.
 - 2. National Planning Policy Framework Sites
 - *Ancient Woodland, and aged or veteran trees*
Planning permission will not be granted for development that results in the loss or deterioration of ancient woodland and aged or veteran trees unless the need for, and benefits of, the development in that location clearly outweigh the loss. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.
 - 3. Locally designated sites, and habitats and species outside designated sites:
 - *Local Nature Reserves*
 - *Sites of Nature Conservation Importance*
 - *Nature Improvement Areas*
 - *Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans*
 - *Biodiversity Opportunity Areas*
 - *Where Protected Species are present*
 - *Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006.*

Proposals which would result in significant harm to biodiversity will be refused unless:

 - this can be avoided by locating on an alternative site with less harmful impact; or*
 - the harm can be adequately mitigated, or, as a last resort, compensated for.”*
 - Policy ENV5: Provision of Open Space and Recreational Facilities. The impact of the increased population from residential development on open space and recreational facilities across the Borough will be mitigated by the use of the Community Infrastructure Levy which will be used to enhance existing areas of open space. This Policy requires development to make provision for open space and recreational facilities.
 - Policy ENV6: Sustainable Design and Construction. In order to maximise carbon efficiency, all homes will be required to meet the strengthened on-site energy performance standards of Building Regulations, and any subsequent increased requirements.
 - Policy ENV7: District Energy Networks. The development of district energy networks and associated infrastructure is encouraged and should be approved unless it results in significant adverse impacts on the environs. The Policy requires that any major development proposal should demonstrate whether it can connect to an existing DEN network where available, and if not available how it may develop its own system, or how it may include site-wide communal energy systems, or be 'network ready' to connect to a DEN on construction or at some point after construction, all subject to technical or financial viability.
 - Policy ENV8: Development and Flood Risk. Development proposals must avoid areas which are exposed to an unacceptable risk from flooding, and must not increase the risk of flooding elsewhere.
 - Policy ENV9: Tackling Water Stress. New dwellings should where viable and technically feasible, meet the Building Regulations optional requirement for tighter water efficiency.
 - Policy ENV10: Pollution Management and Land Contamination. Where a site is known or suspected to be at risk from contaminants or materials that present a hazard to health, information must be provided detailing the methodology through which risks will be addressed, and ensuring the treatment and/or removal of all such contaminants and materials prior to the commencement of development.
 - Policy ENV11: Development and Noise. People's quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. Noise sensitive uses proposed in areas that are exposed to significant noise

from existing or future industrial, commercial or transport (air, road, rail and mixed) sources will be permitted where it can be demonstrated that appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable.

- Policy IN1: Infrastructure Provision. Development will be permitted where it is supported by the necessary infrastructure both on and off site and if mitigation can be provided to avoid any significant cumulative effects on the existing infrastructure services. The council will seek to implement a Community Infrastructure Levy (CIL) through the relevant processes. The rate will be set following the adoption of the Charging Schedule.
- Policy IN2: Strategic Delivery of Telecommunications Infrastructure states that all proposals for residential, employment and commercial development of one unit or more must be designed to be connected to high quality communications infrastructure to ensure that fibre optic or other cabling does not need to be retrofitted.
- Policy IN3: Development and Requirements for Sustainable Transport. Development should be concentrated in locations where sustainable travel patterns can be achieved through the use of the existing transport network, including public transport routes and the cycling and walking network.
- Policy IN4: Car and Cycle Parking Standards. Development will be permitted where the proposals provide the appropriate amount of car and cycle parking to meet its needs when it is assessed against the borough council's car and cycle parking standards.

Supplementary Planning Documents (adopted October 2016)

The Supplementary Planning Documents are non-statutory documents which supplement the policies of the Local Plan and are applicable to this application. In particular:

Urban Design SPD 2016:

- 4.3 The SPD includes further guidance and examples on residential development and sets out further guidance on minimum rear window to window distances (21 metres for two storeys and 30 metres for three storeys or more) and outdoor amenity space standards.
- 4.4 In respect of multi-dwelling residential development (flats) the SPD states:
- *'It is recommended that a minimum of 5sqm of private outdoor space, where the smallest dimension is not less than 1500mm, is provided for 1 to 2 person flats plus an extra 1sqm for each additional occupant. For apartments and flats, a useable private space should also be provided for residents. While balconies provide a good solution, they may not be appropriate in all contexts and a semi-private outdoor, communal space may be suitable.'*
 - *'Flatted developments should be designed in accordance with the recommendations made in this document and with the relevant policies of the Crawley Borough Local Plan, particularly, in relation to urban design, Policies CH2 and CH3. The scale, massing and form of the development should relate to the surrounding area. The openings on the façades should reflect the local vernacular in proportions and a balance should be achieved between solid walls and window/door apertures. The roof design should be considered during the initial design stage and not left to the end to be resolved. Parking provisions should meet the recommendations set in Annex 1.'*
- 4.5 It also includes the Crawley Borough Parking Standards which refer to minimum parking standards. In particular, for 1 bed dwellings/flats in this location the minimum standards are 1.2 spaces and for 2 bed dwellings/flats are to 1.5 spaces. Regarding cycle parking it is stated that: *'All cycle parking must be sheltered and secure and in accordance with local guidance and best practice design. For one bed dwellings: One space per dwelling and 1 space per 8 dwellings for visitors will be required. For two bed dwellings or more: 2 spaces per dwelling and 1 space per 8 dwellings for visitors will be required'*.

Green Infrastructure SPD 2016:

- 4.6 This SPD provides clear guidance on how to meet the requirements of Local Plan Policies in relation to Crawley's Green Infrastructure assets. It provides further guidance on Policy CH6: Tree Planting and Replacement Standards.

Planning and Climate Change SPD 2016:

- 4.7 This SPD includes further guidance on sustainability policies within the Local Plan (Policies ENV6, ENV7, ENV8, ENV9 and IN3).

Affordable Housing SPD (adopted November 2017)

- 4.8 This SPD includes further guidance on affordable housing policies within the Local Plan.

Crawley Community Infrastructure Levy Charging Schedule 2016

- 4.9 The Crawley CIL Charging Schedule is in effect from 17th of August 2016 and is also relevant to this application as the proposal would create new dwellings.

Developer Contributions Guidance Note (published July 2016)

- 4.10 This sets out the Council's approach to developer contributions following the introduction of the Community Infrastructure Levy. It provides details of the CIL charges and when S106 contributions will be sought.

PLANNING CONSIDERATIONS:-

- 5.1 The application is for outline planning permission to consider access and layout, with appearance, scale and landscaping to be reserved. The main planning issues in the determination of this application are:
- The principle of the loss of the employment site
 - The principle of redevelopment of the site for residential use
 - The impact on access, highways and parking
 - The layout of the proposal and its impact on the Site of Nature Conservation Importance, Structural Landscaping and the surrounding area
 - The layout of the proposal and its impact on Ancient Woodland, protected species and archaeology area
 - The design & appearance of the proposal and its visual impact
 - The acceptability of the proposed development for future occupiers (including noise considerations)
 - Impact on the amenity of neighbouring properties and amenities
 - Impact on trees and landscaping
 - Drainage
 - Sustainability
 - Contaminated Land Issues
 - Provision of Affordable and Low Cost Housing
 - Provision of Infrastructure Contributions

The principle of the loss of the employment site

- 5.2 A key planning consideration in the determination of this application is the loss of the employment site and its redevelopment for residential use. The application site forms a vacant plot, measuring approximately 0.9 hectares, that lies within the Tilgate Forest Business Centre Main Employment Area as defined by Local Plan Policy EC2. The key economy related Local Plan policies which are relevant to this application are EC1, EC2 and EC4. Forward Planning has been consulted and raised a strong objection to the proposal.
- 5.3 Policy EC1 clearly states that to ensure that Crawley's recognised economic role and function is maintained and enhanced, the council will ensure that the town's Main Employment Areas are the focus for sustainable economic growth. The Policy recognises that there are only opportunities for approximately 23ha of employment land within the Borough, and the vacant application site of

approximately 0.9 hectares forms part of this remaining business land supply. As a minimum, an additional 35 hectares of land for business uses is required in order to secure future economic growth at Crawley over the Plan period to 2030. The applicant has submitted a planning statement and a marketing report in support of the application. The planning statement regarding Policy EC1 focuses only on the reference of the policy that the preferred location for strategic employment is to the north of Manor Royal and south or east of Gatwick Airport, rather than to the south of the town. This is not a relevant argument as the referenced part of the policy relates to the preferred area for a dedicated strategic employment location, and part (i) of EC1 is clear that the designated main employment areas, including the application site, will be the focus for sustainable economic growth.

- 5.4 As stated by Forward Planning, the business land supply shortfall places particular importance on the need to promote and protect the available land supply for business and economic development generating uses, and the overarching policy position is therefore to retain the available supply of employment land for business use. As a result, the loss of this particular employment site would be contrary to the strategic Policy EC1 objective to promote economic growth for new and existing businesses.
- 5.5 Policy EC2 which relates to economic growth in Main Employment Areas, including Tilgate Forest Business Centre, states proposals that would involve a net loss of employment floorspace in any Main Employment Area, will only be permitted where they are able to satisfy all following criteria:
- i. the site is no longer suitable, viable or appropriate for employment purposes; and
 - ii. the loss of any floorspace will result in a wider social, environmental or economic benefit to the town; and
 - iii. there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.
- 5.6 The loss of employment would therefore need to be assessed against each of the EC2 policy criteria and the applicant's supporting planning statement and marketing report prepared by Stiles Harold Williams.

i. the site is no longer suitable, viable or appropriate for employment purposes

- 5.7 Regarding the first criterion of Policy EC2, the marketing report provides information over the history of the site for over 20 years. It also states the planning history of the site, concluding that a failure to implement a long-standing office permission on this site explains that the locational drivers of the potential office occupiers are, and have, changed strengthening the more traditional locations such as Manor Royal and the Town Centre. The planning statement continues arguing that this is also evidenced by the fact that existing office buildings on Broadfield Business Park have recently obtained prior approval for conversion to residential use under Class O of the GPDO. Based on these arguments, the applicant argues that paragraph 22 of the NPPF should be taken into account, which requires planning policies to avoid the long-term protection of employment sites where there is no reasonable prospect of a site being used for that purpose, at which stage alternative land uses should be considered.
- 5.8 As Forward Planning clearly state, this paragraph of the NPPF must however be balanced with the NPPF requirement to support sustainable economic growth, with the NPPF being clear to identify the promotion of a strong, competitive economy as a key facet of sustainable development. Indeed, NPPF paragraph 19 is clear that *'Planning should operate to encourage and not act as an impediment to sustainable growth...significant weight should be placed on the need to support economic growth through the planning system'*. NPPF paragraph 20 places specific onus on local planning authorities to *'plan proactively to meet the development needs of business and support an economy fit for the 21st century'*, with the first bullet point of paragraph 21 requiring Local Plans to *'set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth'*.
- 5.9 From the original information submitted alongside the application, it is accepted that, despite marketing, the site has not come forward for business development at this time. Notwithstanding this, the Forward Planning Officer clearly argues that: *'in planning policy terms the vacant plot at*

Tilgate Forest Business Park represents one of the few remaining undeveloped employment locations in Crawley, and therefore contributes to what is a limited available supply of business land in the Borough. Of the four buildings currently located in the business park, three are occupied, with the market information explaining that the vacant fourth building is being refurbished ready for market. This suggests that despite the market outlook, there remains a role for out-of-town employment locations, and the continued operation of businesses from Tilgate Forest Business Park demonstrates that the application site remains a suitable and appropriate site for business. Indeed, as recently as November 2015, the Planning Inspector into the Local Plan considered it appropriate for the application site to form part of employment land supply identified in the Local Plan, and as the limited available employment land supply is taken up, the desirability of this site as one of the few remaining vacant plots in the town is likely to increase.'

- 5.10 The site is therefore still suitable, viable and appropriate for employment use. During the course of the application, officers informed the applicant that the loss of the employment site would be contrary to Policy EC2. The applicant was informed that the site is clearly suitable and appropriate for employment as part of the Tilgate Forest Business Centre and, whilst it has been explained that that the site may be less desirable to the market than other employment locations, it is not considered that the site has been demonstrated to be unviable for employment use. The applicant was given the opportunity to provide further supporting information regarding the viability of the site's development.
- 5.11 The applicant submitted a Development Appraisal prepared by Stiles Harold Williams (June 2017) along with a Supplementary Report demonstrating that an office scheme would be unviable on this site. This was independently assessed by Graves Jenkins on behalf of the Council. The report from Graves Jenkins concluded that, at the present time, the site is not viable in relation to office development generally. However, Graves Jenkins assessed other employment uses that could be accommodated within the site in accordance with Policy EC2 criterion i that requires demonstration that the site is no longer suitable, viable or appropriate for employment purposes in general. In terms of any alternative employment use, the Graves Jenkins report states that a small development scheme of business units of 750sqft to 3,000 sqft flexible light industrial and/or storage/distribution units with circa 15% first floor office content would offer a feasible alternative use. It is considered that there would be occupier demand for buildings with such use at the present time.
- 5.12 In response to the Graves Jenkins's viability assessment report, the applicant submitted a Supplementary Report prepared by Stiles Harold Williams (December 2017) arguing that Graves Jenkins did not produce an appraisal which demonstrates the viability of the alternative flexible employment uses suggested. However, as Forward Planning clearly state: *'it is not for the Local Planning Authority to demonstrate that the site, which is located within a designated Main Employment Area, is viable for employment. Rather, in order to satisfy the policy it is for the applicant to demonstrate that the site is no longer viable for employment use.'* The agent continues in his final letter by stating that: *'actual market activity over an extended period does not support Graves Jenkin's position. We therefore maintain that this Main Employment Area can be released for housing in accordance with the NPPF and Local Plan Policy EC2'*.
- 5.13 Based on Graves Jenkins' independent advice, other smaller flexible business units could be a feasible alternative use, and it has not been demonstrated by the applicant that such employment use would be unviable. Therefore, the application site is still suitable, appropriate and viable for employment purposes and the proposal would be contrary to Policy EC2 which seeks to satisfy all three criteria for any loss of employment area.

ii. the loss of any floorspace will result in a wider social, environmental or economic benefit to the town

- 5.14 Regarding the second criterion of Policy EC2 relating to whether the loss of the employment site would result in a wider social, environmental or economic benefit to the town, the planning statement argues that as the application site is a vacant plot that has not been utilised for employment use for 20 years, there can be no loss of employment floorspace. However, as the Forward Planning state: *'the objective of the policy is to promote the Main Employment Areas for*

economic development, and it is intended to be read as applying to both employment floorspace and potential floorspace on employment sites. Therefore, the council would expect the part ii policy criteria to be considered'.

- 5.15 The planning statement continues stating that the re-use of the site of this brownfield site as residential will have clear social, environmental and economic benefits. Whilst, as stated above, the loss of the employment site is not considered to have any economic benefit, it is acknowledged that the principle of delivering residential, including affordable housing, would have social benefits. As a result, the proposal could meet criterion ii of the Policy EC2. However, as already stated above, the proposed loss of employment site has already failed to satisfy criterion i contrary to Policy EC2.

iii. there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.

- 5.16 With regards to criterion iii of the Local Policy EC2, the applicant argues that neither the economic role or function of the Main Employment Area, nor the wider economy of Crawley, will be adversely affected by the introduction of residential use in this location given that the site has been vacant for 20 years, making no contribution to the local economy.
- 5.17 The proposed introduction of residential use is considered to have an adverse impact on the economic function of the Tilgate Forest Business Centre Main Employment Area. As Forward Planning explain the proposed use could undermine the long term function of the Main Employment Area, particularly given that it is a relatively small-scale Business Park where the impact of introducing a non-employment generating use is likely to be felt more acutely. This has been the case at the nearby Broadfield Business Park where an incursion of residential use under the prior approval system has created significant market uncertainty for existing businesses. Any loss of employment land and floorspace at Tilgate Forest Business Park to housing would place similar pressures on the remaining business, and could further erode the desirability of the Main Employment Area as a place to do business.
- 5.18 As was clearly explained above for Policy EC1, Crawley Borough is only able to meet half of its economic (business) land needs over the Plan period, resulting in a significant under-supply of 35 hectares business land. The loss of the application site within a designated Main Employment Area would also have a detrimental adverse impact on the wider function of Crawley. The vacant plot at Tilgate Forest Business Park site therefore offers potential to contribute towards meeting some of the unmet employment needs, and the planning statement does not consider the implications of the loss of this site from the employment land supply pipeline. The loss of the site from employment use would therefore further constrain Crawley's ability to accommodate its already significant employment land needs. The retention of the Main Employment Areas for economic growth is of critical importance to the sustained economic position of the borough over the Plan period. The Local Plan Inspector at paragraph 83 of his report stated: *'Given the scarcity of employment land, policy EC2 rightly seeks to retain existing employment areas in their current uses and to resist any loss of employment floorspace unless certain conditions are met'*. Indeed, in his report into the soundness of the Crawley Local Plan, the Planning Inspector was comfortable with the inclusion of the vacant plot in the Employment Land Trajectory, and for it to form part of the available land supply pipeline identified in the Local Plan.
- 5.19 It is therefore considered that the loss of the vacant employment site to residential use would impact negatively on the employment function of Tilgate Forest Business Park as a Main Employment Area, and would also further constrain the Borough's future ability to meet its projected employment needs, contrary to criterion (iii) of Policy EC2.
- 5.20 Overall, the loss of this vacant employment site would be contrary to the strategic Policies EC1 and EC2 objective to promote economic growth for new and existing businesses within the Main Employment Area. The application site is still considered suitable, viable and appropriate for employment purposes and the loss of the employment site to residential use would have a detrimental adverse impact on the economic function of the Tilgate Forest Business Centre and the wider function of Crawley contrary to Policy EC2 and the relevant paragraphs of the NPPF.

The principle of the redevelopment of the site for residential use

- 5.21 The proposal would provide 80 additional residential units to meet Crawley's housing needs. NPPF objectives seek to promote and encourage residential development on appropriate sites. This site is not included in the Housing Trajectory and it is not a site already identified as suitable for housing. On the contrary, the application site is within the Tilgate Forest Business Centre Main Employment Area as defined by Policy EC2 and forms part of the suitable sites needed to meet the future economic growth needs of Crawley Borough.
- 5.22 The adopted and up-to-date Local Plan takes a positive approach towards the provision of housing and Local Policy H1 makes provision for the development of a minimum of 5,100 net dwellings in the Borough in the period 2015 to 2030. It is acknowledged that there will be a remaining unmet housing need, of approximately 5,000 dwellings, arising from Crawley over the Plan period. The Council's Forward Planning Team provided the following information regarding the housing position of Crawley:
- 'Against the Local Plan Housing Figure (340 dwellings per annum (dpa)), Crawley Borough Council can demonstrate a 9.22 year housing land supply, and against the objectively assessed housing need (OAN) (675dpa) Crawley has a 5.43 year housing land supply (including a contribution towards Crawley's unmet need being provided by Horsham through Kilnwood Vale, but not including an identified amount from Mid Sussex). The most up-to-date Housing Trajectory was published in the Authority's Monitoring Report 2015/16. This shows that, due to over provision against the adopted Local Plan position in the early years, new sustainable sites being promoted, office to residential conversions in the town centre, and higher than anticipated levels of residential units being provided within schemes, the overall supply exceeds the level set out in Local Plan Policy H1 (a total of 5,541 compared to 5,100), and demonstrates that Crawley has a healthy five year housing land supply. In addition, Kilnwood Vale, whilst located within Horsham District's administrative boundaries, will also contribute to meeting needs arising from within Crawley above the supply levels anticipated from within the town. Therefore, in addition to exceeding the annualised average Local Plan housing requirement for the Borough (340 dpa), the total annual OAN for Crawley (675dpa) can be met over the next five years from existing commitments within and adjacent to the town.'*
- 5.23 Based on the above information and up-to-date Local Plan Policies, Crawley Borough can demonstrate a healthy five year housing land supply. The loss of the employment site would have a detrimental adverse impact on the future economic growth needs of Crawley Borough and officers consider that this would therefore outweigh the benefits of providing 80 additional residential units in the Borough.
- 5.24 In addition, the proposed redevelopment of the site for residential use would need to be in accordance with Policies SD1, CH1, CH2 and CH3 of the Local Plan. The Council's Urban Design Officer was consulted on the proposal and raised objections in relation to Policies CH1 and CH2. There are some concerns that the proposed location of the residential use on this site is set away from services, amenities and any of Crawley's neighbourhood centres forcing residents and visitors into car dependency. This contravenes Policies SD1, CH1, IN1 and IN3 regarding the neighbourhood principle and sustainable development. The proposed residential development would be an awkward addition to a small employment cluster on the urban periphery of the Borough that does not respond adequately to Policy CH2: Principles of Good Urban Design (a), (b) or (d). The proposed access arrangement through a road's inward facing character and dead end would not read as public route, rather than as private access route. The proposed scheme features a poor level of connectivity.
- 5.25 In response to these concerns, the applicant stated that the Broadfield neighbourhood centre is in close proximity to the proposed development, the access road already exists as part of the Business Park road system and the proposal includes a new pedestrian / cycleway link from the application site. However, Broadfield neighbourhood centre is not considered by officers to be in close proximity, being 4km away from the application site, and is not in easy reach of the site, given the distance and need to cross the A23, contrary to the neighbourhood principle of Crawley (Policy CH1). The new pedestrian/cycleway link would not be directly from the new development but from

the existing access road of the whole Tilgate Forest Business Centre. This would not suffice to compensate for the poor connectivity and relatively isolated location of the site as the residents would still need to walk through the Business Park to get to A23. As such, in reality residents are going to use the car for the majority of trips and would therefore add to unsustainable travel patterns.

- 5.26 Policy EC4 relates to the relationship between existing businesses and new residential development where this is proposed within or adjacent to Main Employment Areas. The objective of this requirement is to ensure that the operation of existing businesses is not undermined as a result of complaints from the residential occupants relating to loss of amenity. At the present time, the Main Employment Area comprises office uses with no manufacturing or high intensity industrial uses present and therefore the introduction of a residential use in this location could be acceptable in amenity terms. However, there are strong concerns that the introduction of a residential use at this location would further undermine the operation of the Main Employment Area, and that it would potentially constrain the flexibility for future changes of use to employment buildings in what is a designated Main Employment Area.
- 5.27 Overall, the principle of redevelopment of the site for residential is not considered acceptable, given that Crawley Borough can demonstrate a five year housing supply and that the proposal would result in the loss of a valuable employment site to the detriment of the economic function of the Borough. The proposed residential development in this location would feature a poor level of connectivity and would be set away from services and amenities of any of Crawley's neighbourhood centres disrupting the neighbourhood structure of the town and adding to unsustainable travel patterns. It could also pose further constraints on the economic function of the Tilgate Forest Business Centre, as stated by the objection from an existing business, by restricting their use as a result of potential complaints regarding the commercial uses apart from the current office uses. The proposal is therefore considered contrary to Local Policies SD1, H1, CH1, CH2, CH3, EC2, EC4, IN1 and IN3, and the relevant paragraphs of the NPPF.

The impact on access, highways and parking

- 5.28 The site would be accessed via the Tilgate Forest Business Centre using the existing access along Forest Gate. This in turn accesses the A23 Brighton Road via an existing left in left out arrangement. Vehicles leaving the site need to use the busy M23 roundabout (Junction 11 of M23) even if they are ultimately heading to Crawley Town Centre. An improved pedestrian / cycleway link from Tilgate Forest Business Centre site access to connect with the existing cycleway network at the K2 Leisure Centre is also proposed as part of the proposal by widening the existing footway and cycleway to 3m.
- 5.29 WSCC Highways raised no objection from a highway point of view subject to conditions for securing vehicle parking and turning, cycle parking and a Construction Management Plan. They also commented that they would be supportive of the provision to link into the existing cycle network and the enabling of cyclists to reach a number of local facilities without the need to cycle on the carriageway. The applicant approached WSCC Highways and reached an agreement over an initial drawing for this proposed link. Due to land ownership, a direct link cannot be provided to the A23 and so the agreed link would follow the route of the existing footway on Brighton Road and Forest Gate, which does not disturb the boundary screening along the main road frontage. The applicant submitted a new drawing for the proposed link and Highways clarified that they would be happy that link to be included to a S106 agreement if the proposal was otherwise acceptable.
- 5.30 The car parking arrangement would provide a total of 110 car parking spaces, including 4 disabled spaces, which is considered acceptable and is in accordance with the Urban Design SPD. The applicant also submitted a Residential Travel Plan in support of the application. WSCC Highways assessed the submitted Travel Plan and requested some amendments to the Travel Plan incentives; the proposed £50 contribution towards a bicycle is not considered sufficient incentive to achieve modal shift. The applicant amended the contribution to £150 voucher and WSCC Highways confirmed that they are happy with this amendment. This could be incorporated into any Section 106 agreement.

The layout of the proposal and its impact on the Site of Nature Conservation Importance, Structural Landscaping and the surrounding area

- 5.31 The application is for Outline Planning Permission and the applicant has requested that only access and layout are assessed and all other matters (scale, appearance and landscaping) to be considered at the Reserved Matters stage. The layout relates to the way in which buildings, routes and open spaces within the development are provided, situated and orientated in relation to each other and to buildings and spaces outside the development. The submitted Design and Access Statement states that the layout has been developed to broadly reflect the layout of buildings approved under the extant consent, which was originally approved under planning reference: CR/2006/0607/FUL. However, this relates to an office development with associated parking and whilst it is an extant permission, since it was granted, and renewed in 2013, a new up-to-date Local Plan with new policies regarding Structural Landscaping and Ancient Woodland areas has been adopted.
- 5.32 The proposed development with two four-storey residential buildings would have a significant footprint. In addition, the associated car parking arrangements would occupy a significant part of the site leaving a small amount of area to be used for landscaping and communal amenity area to the east and west. This is not considered an acceptable layout given the constraints on the site and surrounding area. To the east of the site there is an area of trees that forms part of the SNCI. To the west are protected trees and this part of the site is also in the SNCI. The level also changes significantly on the eastern side of the site and the land drops down to the eastern boundary. Part of the proposed car park at the west and east of the site is outside the built up area and is within the Tilgate/Worth Rural Fringe Landscape Character Area as identified by Policy CH9. The main objective of this policy is to ensure that Crawley's compact nature and attractive setting is maintained and specific to this area is to conserve the high landscape value of Tilgate Park. In addition, all soft landscaping within the site and adjacent is designated as Structural Landscaping
- 5.33 Whilst the applicant requested 'landscaping' to be considered at the Reserved Matters stage, the proposed layout (assessed by this outline application) would mean that the proposed car parking areas would encroach into the existing area of structural landscaping and SNCI which is not considered acceptable. The applicant has undertaken a landscape and visual impact assessment, but the assessment does not acknowledge or address the encroachment of the car park areas into the area of structural landscaping and within the SNCI which is contrary to the aims of Policies CH7 and ENV2.
- 5.34 The proposal with the extensive car parking area would leave two small useable amounts of communal amenity areas. The Urban Design SPD clearly states that the external space provided should meet basic privacy, amenity and usability requirements, suitable for the likely level of occupancy. The communal amenity areas are not considered to be useable given that to the west it would be close to a noisy road and to the east there is a significant change in level. In addition, both proposed communal amenity areas would be seriously prejudiced by extensive parking areas within the layout and SNCI areas to the east and west, contrary to the Urban Design SPD, Local Policy CH3 and ENV2. The approved layout (ref: CR/2006/0607/FUL) that the applicant attempts to imitate as part of the previously approved application with extant permission relates to office development and is not considered a compatible and suitable layout for residential development for future occupiers, and as previously stated there is the new up-to-date Local Plan with new policies regarding structural landscaping and Ancient Woodland areas.
- 5.35 Overall, the proposed development, by reason of its layout, building footprint and extensive car parking on such a constrained site, and due to its poor relationship with Tilgate/Worth Rural Fringe Landscape Character Area, locally designated Site of Nature Conservation Importance and Structural Landscaping would constitute overdevelopment of the site which would be harmful to the visual amenities and character of the area. It would therefore conflict with Policies CH2, CH3, CH7, H1 and ENV2 of the Crawley Borough Local Plan 2015-2030 and the relevant paragraphs of the National Planning Policy Framework (2012).

The layout of the proposal and its impact on Ancient Woodland, protected species and archaeology area

- 5.36 To the north of the site the majority of the boundary comprises a dense area of Ancient Woodland. The extreme eastern corner of the application site also contains area of Ancient Woodland. According to Policy ENV2, a buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice. This buffer zone should be 15m. Block 1 would be between 7-10 metres from the Ancient Woodland (north), whilst Block 2 would be between 5-8 metres from the Ancient Woodland (north). The Policy continues stating that proposals which would result in significant harm to biodiversity will be refused unless the harm can be adequately mitigated.
- 5.37 The applicant initially submitted an Ecological Appraisal in support of the application. The Council's Ecology Consultant assessed the information submitted and considered that there is a significant risk that the proposal would lead to deterioration of the woodland due to disturbance of fauna, dumping of rubbish, removal of dead wood/dead trees on safety grounds, pruning along the woodland edge and garden/amenity plants colonising adjacent woodland. The applicant responded to these concerns raised and argued that the existing situation of the concrete hardstanding extending up to the woodland margin. The applicant provided additional ecological assessment and review report over these concerns. The Council's Ecology Consultant assessed the additional information. In particular, paragraph 5.32 of the applicant's ecological assessment and review report states: *'The greatest potential for ecological enhancement is considered to lie with the plantation adjacent to the Business Park which is reported as being situated on an ancient woodland site. It is currently a poor example of its kind, being species-poor and structurally rather uniform, with little semi-natural component to the vegetation. There is also significant encroachment by invasive non-native species. Any proposals involving this land would have to be done with the agreement of the landowner, but the applicant has agreed to contribute to a scheme which involves the restoration of this area.'* Whilst the buffer zone of 15m would not be achieved on this site, the Council's Ecology Consultant considers that this restoration of the Ancient Woodland could provide adequate mitigation in accordance with ENV2. A S106 agreement would be required to cover this restoration of this area if the application was otherwise acceptable.
- 5.38 Policy ENV2 also refers to protected species requiring habitat and species surveys and associated reports to accompany planning applications which may affect the locally designated SNCI and Ancient Woodland areas or sites showing likely ecological value based on past ecological surveys. The initial ecological appraisal and reptile survey identified the breeding colonies of grass snake, adder and slow worm on those parts of the site not presently covered by hardstanding. Initially, the Council's Ecology Consultant considered that notwithstanding the proposed mitigation measures and habitat enhancements, there is a significant risk that the disturbance caused by residential use would result in abandonment of these areas to the detriment of this population. Adders are particularly intolerant of disturbance. He also concluded that, at that stage, insufficient information was submitted regarding other protected/notable species (such as bats) that the initial ecological appraisal report made reference to.
- 5.39 The applicant has submitted additional studies and surveys (Amphibian survey, Bat Survey, Ecological Assessment and Review and External Lighting Report) in support of the application. The reports confirm that no evidence of dormice was found either associated with the dormouse tubes or during the nut search, the latter revealing only evidence of grey squirrel *Sciurus carolinensis*. Regarding the bat surveys, these involved ultrasonic activity surveys and a trapping exercise using mist nets, harp traps and an acoustic lure. The bat surveys revealed moderate levels of foraging by common pipistrelle bats within the application site itself although activity by other species was minimal.
- 5.40 Within the surrounding plantation close to the site, the presence of other species was detected including a single record of the rare Bechstein's bat (*Myotis bechsteinii*). As stated within the Ecological Assessment and Review report: *'However, the proposals are not considered likely to cause significant direct impacts to the surrounding plantation and there will be no impacts to trees which are potentially suitable as bat roost sites. But there is the potential for an increase in light pollution arising from the scheme which might result in a deterioration in quality of the adjacent habitat as a foraging resource (see SEC, 2017). This possibility has been examined in a lighting*

study (RHB, 2017) which shows that a development could be implemented with minimal changes to the lighting regime around the site periphery. It is therefore concluded that the scheme need not result in significant effects to bats or other nocturnal wildlife as a result of light pollution.' The Council's Ecology Consultant reviewed all these reports and confirmed that he is happy that the protected species issues can be addressed via condition if the application was otherwise acceptable.

- 5.41 The application site is adjacent to an identified Archaeological Area related to Tilgate Forest and its known associated heritage features. The West Sussex Archaeological Officer has been consulted and stated that it is possible that deeper cut archaeological features may have survived undisturbed, or in those areas of the site not previously developed. As such a programme of archaeological work in accordance with a Written Scheme of Investigation would be required to be provided and this could be secured by a condition if the application was otherwise acceptable.
- 5.42 Overall, whilst the buffer zone of 15m would not be achieved in relation to proposed development and Ancient Woodland, the proposed restoration of the Ancient Woodland could provide adequate mitigation in accordance with ENV2 which could be secured via a S106 agreement. The proposal is considered acceptable regarding the impact on the protected species and archaeology area subject to appropriate conditions, and would therefore accord with the relevant Local Plan Policies, the Urban Design SPD and the NPPF.

The design & appearance of the proposal and its visual impact

- 5.43 The applicant requested that scale and appearance are to be considered at the Reserved Matters stage. Whilst the application does include some front elevations and indicative floor layouts of the two buildings, these are intended for illustrative purposes and would be subject to subsequent 'reserved matters' application if the application was otherwise acceptable.
- 5.44 The proposed scheme would introduce a substantial built form in a constrained site surrounded on three sides by undeveloped forest and woodland and there are concerns about the possible impact that the scale, massing and height of the four storey blocks would have when viewed from these sites and public access. However, these concerns do not relate to this outline application for access and layout only.
- 5.45 The site is also within the Long Distance View Splay from Buckswood Drive as identified by the Local Policy CH8. The Policy requires the applicant to demonstrate that the development would not result in direct adverse impact or lead to the erosion of these views. No information has been provided regarding this long distance view. The submitted landscape and visual impact assessment report does not make reference to this view. However, it is considered that it is unlikely that the proposal in this location would obstruct these view, given the adjoining office buildings of a similar height and the trees to the west screening the proposal.

The acceptability of the proposed development for future occupiers (including noise considerations)

- 5.46 The proposed development would deliver a range of 1 and 2 bedroom apartments. Policy CH5: Standards for all New Dwellings states that new dwellings must create a safe, comfortable and sustainable living environment and sets out minimum sizes for each dwelling, which is based on the Nationally Described Space Standards. The illustrative floor plans show that all the units would meet the minimum space standards which is considered acceptable.
- 5.47 The illustrative floor layout of the buildings and the layout of the development assessed by this application suggest that some of the residential units would have a single north aspect at each floor and would look directly onto an area of tall mature trees within the Ancient Woodland. The distance between the windows and tree canopies would be approximately 2 metres. Given this orientation and distance, it is considered that the applicant has failed to demonstrate that these bedrooms would receive sufficient direct sunlight or daylight, and this factor added to the close proximity of the trees would result in very badly lit rooms from the trees and would create an unsuitable environment for future occupiers of the flats. It should be noted that the close relationship of the trees to the proposed building and the impact upon the amenities of future occupiers from overshadowing, leaf

drop etc. would also be likely to result in ongoing pressure to reduce/remove the trees which would be to the detriment of the health and amenity of the trees and the visual amenities and character of the locality.

- 5.48 There would also be a 15m separation distance between the proposed buildings. There are no illustrative side elevations or floor layouts with details of windows and there is therefore a concern that there would be overlooking between the proposed side flats to the detriment of residential amenity. In addition, the southern windows of Block 2 would be 21m away from the office rear windows (3-storey development) to the south which is not considered an acceptable situation. It should be noted that the Urban Design SPD seeks a minimum distance of 30 metres between windows in developments of three storeys or more.
- 5.49 In terms of outdoor amenity space the illustrative drawings show that communal outdoor amenity would be provided to the side of both new buildings. The Council's Urban Design SPD recommends that a minimum of 5sqm of private outdoor space, where the smallest dimension is not less than 1500mm, is provided for 1 to 2 person flats plus an extra 1sqm for each additional occupant. Based on illustrative elevations, the proposal would provide Juliet balconies. Whilst the proposed communal amenity area would meet the size standards, it would not be useable and suitable for the level of occupancy given that to the west it would be close to a noisy road and to the east there is a significant change in level adjacent to Ancient Woodland area. In addition, both proposed communal amenity areas would be seriously prejudiced by extensive parking areas within the layout and SNCl areas to the east and west and heavily overshadowed by existing trees contrary to the Urban Design SPD, Local Policy CH3 and ENV2.
- 5.50 The site is subject to noise disturbance from A23 and adjacent existing commercial units. The Council's Environmental Health Team have commented that a survey would need to be carried out to assess the potential issues of noise from the A23 affecting residents. The Local Plan Policy ENV11 clearly states that noise sensitive uses, such as residential use, that are proposed in areas that are exposed to significant noise from existing road sources will be permitted where it can be demonstrated that appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. No information has been provided regarding noise considerations and it has not been demonstrated that the scheme would provide an acceptable noise environment for future occupiers.
- 5.51 The Council's Environmental Health Team also stated that: *'As the residents are being located adjacent to existing commercial units there is a risk that the future residents may be exposed to potential statutory nuisances from those commercial activities, i.e. noise, smells, odours etc. If this was the case it would be incumbent on those business to abate the nuisance, which could affect them financially. It is unclear whether any of the commercial units operate outside normal working hours. Therefore a survey will need to be carried out to assess any impact from the commercial units.'* It is acknowledged that, at present, the adjoining properties to the south are office buildings and as a result the proposal could be acceptable in noise terms.
- 5.52 According to the submitted layout, there would be additional dedicated refuse facilities to the west of the application site. The Council's Refuse and Recycling Team has raised no objection regarding the location for bins, but they stated that sufficient information is needed regarding size and capacity of the bin stores.
- 5.53 Overall, the applicant has failed to demonstrate that the proposed development would provide a satisfactory living environment for potential future occupiers in particular for the north facing single aspect units by way of acceptable outlook and natural lighting/sun lighting and in general in terms of acceptable noise from the adjacent busy road, useable communal amenity space, and an acceptable relationship between side flats, and south flats and offices to the south to prevent overlooking. The proposal would therefore conflict with Policies CH3, H1, ENV2 and ENV11 of the Crawley Borough Local Plan 2015-2030, the Urban Design SPD (2016) and the relevant paragraphs of the National Planning Policy Framework (2012).

Impact on the amenity of neighbouring properties and amenities

- 5.54 The nearest neighbouring buildings which could be affected by the proposal are 1 and 4 Tilgate Forest Business Centre (4 storey office buildings) to the south, which are approximately 32m and 21m from the proposed development respectively. The orientation and the relationship of this building with the application site is such that there would not be a harmful impact through overdominance or overshadowing on these office buildings. However, as stated above, there is a concern regarding the overlooking from the office rear windows of No.4 to the proposed southern windows of Block 2.
- 5.55 To the north west corner there is a two storey house (No.3 Pease Pottage Hill) and garden with two single storey outbuildings which faces the A23. This dwelling is slightly below the application site. The proposed 4-storey building at a maximum height of approximately 15m would be set away from the side elevation of No.3 Pease Pottage Hill by nearly 47 metres, which is in accordance with the guidance contained in the Urban Design SPD. It is therefore considered that there would be sufficient separation distance to ensure that no overlooking or loss of privacy would result from the proposal.
- 5.56 Overall, the proposed development is considered acceptable regarding the impact on the amenities enjoyed by the occupants of neighbouring properties and would accord with the relevant Local Plan Policies, the Urban Design SPD and the NPPF.

Impact on trees and landscaping

- 5.57 There are several trees along the site boundaries to the north and west of the site. Those to the west are protected. To the north of the site the majority of the boundary comprises a dense area of Ancient Woodland. The extreme eastern corner of the application site also contains area of Ancient Woodland. The submitted Arboricultural Impact Assessment Report identifies that 21 trees would require removal to facilitate the development. None of these removals include any protected tree or are within the Ancient Woodland. The Council's Arboriculturist visited the site to identify all trees stated in the Report and raised no objection to the proposal, provided all works would be in accordance with the Arboricultural Impact Assessment Report. It should be however noted that the close relationship of the retaining trees to the proposed building and the impact upon the amenities of future occupiers from overshadowing, leaf drop etc. would also be likely to result in ongoing pressure to reduce/remove the retaining trees to improve living conditions to the detriment of the health and amenity of the trees and the wider visual amenity and character of the locality.
- 5.58 'Landscaping' issues have been requested to be considered at the Reserved Matters stage. However, the applicant submitted indicative Landscape Strategy Plan (hard and soft landscaping) that are for illustrative purposes. The layout and landscape scheme are not considered acceptable given that they do not acknowledge or address the encroachment of the car park areas into the area of structural landscaping and within SNCI contrary to the aims of Policies CH7 and ENV2.
- 5.59 Policy CH6 requires that landscape proposals for residential development should contribute to the character and appearance of the town by including at least one new tree for each new dwelling, of an appropriate species and planted in an appropriate location. It also states that where development proposals would result in the loss of trees, applicants must identify which trees are to be removed and replaced in order to mitigate for the visual impact resulting from the loss of the tree canopies. In accordance with the Arboricultural Impact Assessment Report, the removal of the 21 trees would require 50 replacement trees, and 28 new trees would be provided on site. As set out in the Green Infrastructure SPD, 80 new trees and 50 replacement trees would need to be provided on site or as payment in lieu (£700 per tree) of this provision. On this basis, a formula for calculating the appropriate payment will need to be included in the S106 Agreement, if the application was otherwise acceptable, as the basis for the commuted sum (no. of trees to be lost on site (50 trees including replacement requirements) plus 80 new residential units minus the number of trees to be provided on site (28) multiplied by £700). This would give a potential contribution of £71,400 for tree planting mitigation.

Drainage

5.60 The application has been accompanied by a Flood Risk Assessment including Surface Water Drainage Assessment which indicates the need to store flows due to the increased rate of run off. It also explains that detailed design has not yet been undertaken but potential strategies considered include either an attenuation basin or cellular under car parking storage. Future maintenance responsibilities have yet to be identified. The CBC's Drainage Officer has raised no objection to the surface water drainage proposals and commented that the drainage strategy is generally comprehensive for an outline application. He would prefer to see any site development use environmental SUD techniques with the final design including the development of a storage pond to the east of the site as opposed to cellular storage.

Sustainability

5.61 The applicants have sought to address the requirements of policies ENV6, ENV7 and ENV9 by providing an outline energy and sustainability report. The Council's Energy Efficiency & Sustainability Officer commented that a Sustainability Statement should be conditioned to be provided for the reserved matters, since the energy performance of a development would partly depend on detailed design. Subject to conditions it is therefore considered that the development has adequately addressed the requirements in these policies.

Contaminated Land issues

5.62 The Council's GIS mapping system identifies the site as contaminated land. The applicants submitted an Environmental Site Assessment Phase 1 & 2 Report to address the requirements of Policy ENV10. However, this report has been prepared in relation to a commercial redevelopment on the site and it is therefore not a suitable risk assessment for the proposed residential use. A new risk assessment including conceptual model should be submitted in relation to the new proposed residential development and the Council's Contaminated Land Officer commented that this could be addressed via a condition.

Provision of Affordable and Low Cost Housing

5.63 Crawley Borough Local Plan Policy H4 requires that 40% affordable housing will be required from all residential developments, with a minimum of 70% to be Affordable Rent, or Social Rent where other forms of subsidy exist, and up to 30% Intermediate tenure. The Planning Statement states that the applicant accepts that requirement, with the final mix of unit types and tenure to be determined in discussions with the Borough Council and enshrined in a Section 106 obligation. The mixture of unit sizes is in response to Crawley's affordable housing needs and Local Policy H3. The application is therefore considered to comply with Local Plan Policies H3 and H4 and the objectives of the NPPF subject to a S106 agreement if the proposal was otherwise acceptable.

Provision of Infrastructure Contributions

5.64 Policy IN1 requires developments to make provision for their on and off site infrastructure needs and confirms that the Council will seek to implement a Community Infrastructure Levy (CIL). The Crawley CIL Charging Schedule is in effect from 17th of August 2016 and is also relevant to this application since the proposal is for new residential units. According to the CIL Charging Schedule 2016 the charge for residential within the boroughwide zone is £100 per sqm subject to indexation. Should planning permission be granted, an informative should be attached to the decision notice to inform that this development constitutes Community Infrastructure Levy 'CIL' liable development which is a mandatory financial charge on development.

5.65 The proposal would involve the creation of 80 new residential units and therefore it could trigger off-site contributions towards play space and allotments. According to the Countryside & Open Space Officer, the proposed development could trigger contributions for the provision of at least 181sqm allotment to be provided on site. Rooftop allotments are also encouraged in this location to cater for residents of the development. The agent accepted this requirement and commented that the illustrative drawings show buildings with pitched roof and therefore allotments would need to be

provided as part of the detailed landscape scheme. The Council's Ecology Consultant commented that this could be achieved, but it needs to be carefully designed not to impinge on the ecological mitigation. This can also be addressed via a condition if the application was otherwise acceptable.

- 5.66 Therefore, a Section 106 Agreement would be required to secure the following:
- the 181sqm of allotments and tree mitigation (£71,400) infrastructure contributions;
 - the affordable housing provision in accordance with Policy H4;
 - the implementation of restoration measures of the adjacent Ancient Woodland areas contained within the submitted Ecological Assessment and Review report;
 - the implementation of measures contained within the submitted Travel Plan, and
 - the implementation of the agreed new pedestrian / cycleway link from Tilgate Forest Business Centre to connect with the existing cycleway network at K2 Leisure Centre.

CONCLUSIONS:-

- 6.1 The application is for outline planning permission to consider access and layout, with appearance, scale and landscaping to be reserved, for the erection of two four-storey residential buildings, comprising 80 one and two bedroom flats, with associated car parking at undercroft and surface level and communal private amenity space. The application site comprises 0.9 hectares of vacant land within the designated Tilgate Forest Business Centre Main Employment Area as defined by Local Plan Policy EC2.
- 6.2 The main planning consideration in the determination of this application is the loss of the employment site and its redevelopment for residential use. The loss of this vacant employment site would be contrary to the objectives of strategic Policies EC1 and EC2 to promote economic growth for new and existing businesses within the Main Employment Area. The application site is still considered suitable, viable and appropriate for employment purposes and the loss of the employment site to residential use would have a detrimental adverse impact on the economic function of the Tilgate Forest Business Centre and the wider function of Crawley contrary to Policy EC2 and the relevant paragraphs of the NPPF.
- 6.3 In addition, the principle of redevelopment of the site for residential is not considered acceptable, given that Crawley Borough can demonstrate a five year housing supply and that the proposal would result in the loss of a valuable employment site to the detriment of the economic function of the Borough. The proposed residential development in this location would feature a poor level of connectivity and would be set away from services and amenities of any of Crawley's neighbourhood centres disrupting the neighbourhood structure of the town and adding to unsustainable travel patterns. It could also pose further constraints on the economic function of the Tilgate Forest Business Centre by restricting their use as a result of potential complaints regarding the commercial uses apart from the current office uses. The proposal is therefore considered contrary to Local Policies SD1, H1, CH1, CH2, CH3, EC1, EC2, EC4, IN1 and IN3, and the relevant paragraphs of the NPPF.
- 6.4 The submitted layout of the proposal raises significant concerns and it is considered that the proposed development, by reason of its layout, building footprint and extensive car parking on such a constrained site, and due to its poor relationship with Tilgate/Worth Rural Fringe Landscape Character Area, locally designated Site of Nature Conservation Importance and Structural Landscaping would constitute overdevelopment of the site which would be harmful to the visual amenities and character of the area. It would therefore conflict with Policies CH2, CH3, CH7, CH9, H1 and ENV2 of the Crawley Borough Local Plan 2015-2030 and the relevant paragraphs of the National Planning Policy Framework (2012).
- 6.5 Furthermore, the applicant has failed to demonstrate that the proposed development would provide a satisfactory living environment for potential future occupiers in particular for the north facing single aspect units by way of acceptable outlook and natural lighting/sun lighting and in general in terms of acceptable noise from the adjacent busy road, useable communal amenity space, and an acceptable relationship between side flats, and south flats and offices to the south to prevent overlooking. The proposal would therefore conflict with Policies CH3, H1, ENV2 and ENV11 of the

Crawley Borough Local Plan 2015-2030, the Urban Design SPD (2016) and the relevant paragraphs of the National Planning Policy Framework (2012).

- 6.6 Based on the above matters, it is recommended to refuse outline planning permission for this application. Other concerns regarding ecology, design, drainage and compliance with Environment Policies and Policy CH6 for Trees have also been identified, but they could be resolved by conditions and a Section 106 agreement if the proposal was otherwise acceptable.

RECOMMENDATION RE: CR/2017/0346/OUT

REFUSE for the following reasons:

1. The proposal would result in the loss of an employment site which would be contrary to the objectives of strategic Policies EC1 and EC2 to promote economic growth for new and existing businesses within the Main Employment Area. The application site is suitable, viable and appropriate for employment purposes and the loss of the employment site to residential use would have a detrimental adverse impact on the economic function of the Tilgate Forest Business Centre and the wider function of Crawley contrary to Policies EC1 and EC2 of the Crawley Borough Local Plan 2015-2030 and the relevant paragraphs of the National Planning Policy Framework (2012).
2. The principle of redevelopment of the site for residential is not considered acceptable, given that Crawley Borough can demonstrate a five year housing supply and that the proposal would result in the loss of a valuable employment site to the detriment of the economic function of the Borough. The proposed residential development in this location would feature a poor level of connectivity and would be set away from services and amenities of any of Crawley's neighbourhood centres disrupting the neighbourhood structure of the town and adding to unsustainable travel patterns. The proposal could also pose further constraints on the economic function of the Tilgate Forest Business Centre by restricting their use as a result of potential complaints regarding the commercial uses apart from the current office uses. The proposal is therefore considered contrary to Policies SD1, H1, CH1, CH2, CH3, EC1, EC2, EC4, IN1 and IN3 of the Crawley Borough Local Plan 2015-2030 and the relevant paragraphs of the National Planning Policy Framework (2012).
3. The proposed development, by reason of its layout, building footprint and extensive car parking on such a constrained site, and due to its poor relationship with Tilgate/Worth Rural Fringe Landscape Character Area, locally designated Site of Nature Conservation Importance and Structural Landscaping would constitute overdevelopment of the site which would be harmful to the visual amenities and character of the area. It would therefore conflict with Policies CH2, CH3, CH7, CH9, H1 and ENV2 of the Crawley Borough Local Plan 2015-2030, the Urban Design SPD (2016) and the relevant paragraphs of the National Planning Policy Framework (2012).
4. It has not been demonstrated to the satisfaction of the Local Planning Authority that the proposed development on this site would provide a suitable living environment for the future occupiers in particular for the north facing single aspect units by way of acceptable outlook and natural lighting/sunlighting and in general in terms of acceptable noise from the adjacent busy road, useable communal amenity space, and an acceptable relationship between side flats, and south flats and offices to the south to prevent overlooking. The proposal would therefore conflict with Policies CH3, H1, ENV2 and ENV11 of the Crawley Borough Local Plan 2015-2030, the Urban Design Supplementary Planning Document (2016) and the relevant paragraphs of the National Planning Policy Framework (2012).
5. An agreement is not in place to ensure that the appropriate contributions to secure Affordable Housing, tree planting, allotments, implementation of restoration measures of the adjacent Ancient Woodland areas contained within the submitted Ecological Assessment and Review report, implementation of measures contained within the submitted Travel Plan and implementation of the agreed new pedestrian / cycleway link are provided. The development is therefore contrary to Policies H4, CH6, ENV2, ENV5, IN1 and IN3 of the Crawley Borough Local Plan 2015-2030, the Affordable Housing Supplementary Planning Document (2017), the Green Infrastructure Supplementary Planning Document (2016) and the relevant paragraphs of the National Planning Policy Framework (2012).

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:

- Providing advice in a timely and manner through pre-application discussions/correspondence.
- Liaising with agent and discussing the proposal where considered appropriate and necessary in a timely manner during the course of the determination of the application.
- Seeking 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 possible to negotiate a satisfactory way forward due to the harm that would be 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.



ArcGIS Web Map



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