

LOCATION: [THE OFFICE, CRAWLEY BUSINESS QUARTER, MANOR ROYAL, NORTHGATE, CRAWLEY](#)
WARD: Langley Green & Tushmore
PROPOSAL: DEMOLITION OF EXISTING BUILDING AND ASSOCIATED STRUCTURES AND REDEVELOPMENT FOR STORAGE AND DISTRIBUTION WAREHOUSE WITHIN USE CLASS B8

TARGET DECISION DATE: 6 July 2021

CASE OFFICER: Mrs A. Sanders

APPLICANT'S NAME: RB (GATWICK) LTD
AGENT'S NAME: TDH Estates Limited

PLANS & DRAWINGS CONSIDERED:

Drawing Number	Revision	Drawing Title
2529 P411 Rev	A	Site Location Plan
2529 P412 Rev	A	Block Plan - Existing
2529 P406 Rev	P	Proposed Site Plan
2529 P416	A	Block Plan - Proposed
2529 P100 Rev	E	Proposed Floor Plans
2529 P102 Rev	B	Proposed GIAs
2529 P101 Rev	C	Proposed GEAs
2529 P110 Rev	B	Proposed Roof Plan
2529 PSK04 Rev	G	Proposed Elevations
2529 P300 Rev	A	Proposed Typical Building Section
2529 P310		Site Sections
2529 P413 Rev	B	Surface Finishes Plan
2529 P414 Rev	B	Boundary Treatments Plan
2529 P415 Rev	B	External Furniture Plan
1610 KC XX Y 01 Rev	0	Tree Constraints Plan
1610 KC XX Y 01 Rev	0	Tree Protection Plan
LLD2253-LAN-DWG-010 Rev	04	Landscape Strategy Masterplan

CONSULTEE NOTIFICATIONS & RESPONSES:-

Statutory Consultees

- | | | |
|----|--------------------------------------|------------------------------------|
| 1. | GAL Aerodrome Safeguarding | No objection subject to conditions |
| 2. | WSCC Highways | No objection subject to conditions |
| 3. | National Air Traffic Services (NATS) | No objection |
| 4. | WSCC Lead Local Flood Authority | No objection subject to conditions |

Other Consultees

- | | | |
|-----|-------------------------------------|------------------------------------|
| 5. | Environment Agency | No objection subject to conditions |
| 6. | Thames Water | No objection subject to conditions |
| 7. | Sussex Building Control Partnership | No comments received |
| 8. | CBC Drainage Officer | No objection subject to conditions |
| 9. | CBC Planning Arboricultural Officer | No comments received |
| 10. | CBC Environment Team | No comments received |

11.	CBC Contaminated Land Officer	No objection subject to conditions
12.	CBC Environmental Health Officer – Noise	No objection
13.	Crawley Cycle & Walking Forum	Requested amendments regarding the cycle layout, access and increase in the number of spaces
14.	Southern Water Ltd	No objection subject to conditions
15.	CBC Energy Efficiency & Sustainability	No objection subject to conditions
16.	Archaeology Officer	No objection
17.	Ecology Officer	No objection subject to conditions
18.	CBC Manor Royal	No objection
19.	CBC Air Quality Officer	No objection subject to conditions
20.	CBC Economic Development	No objection subject to condition
21.	Manor Royal Business District	No objection
22.	The Gatwick Diamond Initiative	No comments received

NEIGHBOUR NOTIFICATIONS:-

The application has been advertised through a press advert and by two site notices that were displayed at the site on 28th April 2021 with an expiry date of 20th May 2021.

RESPONSES RECEIVED:-

None

REASON FOR REPORTING TO COMMITTEE:-

The application is a major development.

THE APPLICATION SITE:-

- 1.1 The application site is located within Crawley Business Quarter which is within the larger Manor Royal area. The estate roads are privately maintained, with the public highway located further to the north at Fleming Way and to the south at Manor Royal. There are roundabouts to the immediate north and south of the site from which the site is accessed, plus there are two access points along the western boundary.
- 1.2 The site is broadly rectangular in shape and extends 2.55 ha with the long axis running north to south. The site contains The Office, a 5 storey office building comprising approximately 13,800 sqm. The building was last occupied by Virgin Atlantic. The building has a series of gables, projecting stairwells and entrance features principally in brick with a tiled roof. The building sits centrally within the plot with surface level car parking to the north, west and south. The eastern part of the site contains a decked car park, in concrete, over 2 levels. The car park is broken up by low hedges and some trees, with further landscaping along the northern, western and southern boundary. There is a central courtyard with a staff amenity facility and landscaping.
- 1.3 The site lies within the Manor Royal Main Employment Area as defined by Policy EC3 in the Crawley Borough Local Plan 2015-2030. The site also lies within a Priority Area for a District Energy Network (Policy ENV7) and within the Long Distance Viewpoint from Target Hill (Policy CH8). The Council's records identify the site as contaminated land. It is also within the Gatwick Airport and National Air Traffic Services (NATS) safeguarding zones. Buildings within this area exceeding 10m in height require consultation with Gatwick Airport Limited (GAL) and NATS. The site is also covered by an Article 4 Direction removing certain permitted development rights.

THE PROPOSED DEVELOPMENT:-

- 2.1 The proposal is for the demolition of the existing building and the redevelopment of the site with a storage and distribution warehouse within use class B8 to be operated by Hermes. The proposed building would measure approximately 7,100sqm at ground floor with an office mezzanine of approximately 660sqm giving a total area of approximately 7800sqm. The building would be positioned at a mid-point north to south but set against the eastern boundary with staff car parking to the south and lorry parking and manoeuvring areas to the north and west. The existing accesses to the north and the south would be retained whereas the two accesses to the west would be removed. The existing boundary landscaping to the north, west and south would be largely retained with further enhancements.
- 2.2 The building would be a warehouse style with a mixture of contemporary horizontal flat panel cladding, vertical profiled cladding, feature flashings, trim colours and glazing with a flat roof. The building would have a mixture of dark grey, light grey and blue cladding. The building would measure a maximum width of 61.5m, a length of 116m and a maximum height of 16.15m. It is proposed that 95 car parking spaces would be provided to the south of the site for staff members. Of which, 19 would be electrical charging spaces, 6 disabled spaces and 9 car sharing spaces. 24 cycle parking spaces would also be located to the south. 48 HGV/LGV spaces are proposed to the west and the north east of the site and 22 docking stations are proposed to the north and west elevations of the building. These spaces would be accessed from the north. The site would be enclosed by 2.4m green paladin (mesh) fencing which would be located behind the existing landscaping buffer.
- 2.3 Hermes currently occupy a unit at Woolborough Lane in Crawley from which they would vacate and they propose to relocate to this site to expand their operations. They have advised that their existing site is no longer fit for their needs, being too small and with limited yard space and a building of around 4,000 sqm. The proposed facility would allow for increasing delivery demands, with an increase from around 90,000 parcels per day to 180,000 parcels per day. Around 158 jobs would be retained with an additional 67 jobs created.
- 2.4 The following documents have been submitted in support of the application:
- Design and Access Statement
 - Planning Statement
 - Transport Assessment
 - Economic Statement
 - Air Quality Assessment
 - Energy and Sustainability Statement
 - Statutory Services Report
 - Tree Survey and Impact Assessment
 - Flood Risk Assessment and Drainage Strategy
 - Contaminated Land Risk Assessment
 - Ecology Appraisal
 - Dust Management Plan
 - Archaeology Desk Based Assessment
 - Landscape Strategy

PLANNING HISTORY:-

- 3.1 CR/2021/0160/DEM - PRIOR NOTIFICATION FOR PROPOSED DEMOLITION
Prior Approval Approved

PLANNING POLICY:-

- 4.1 National Planning Policy Framework

The National Planning Policy Framework (NPPF) published in 2019 states that the purpose of the planning system is to contribute to the achievement of sustainable development. In achieving this the planning system has three overarching objectives which are interdependent and need to be secured in mutually supportive ways. These are an economic objective, a social objective and an environmental objective.

- Section 2 – Achieving sustainable development. This section states that achieving sustainable development means that the planning system has three overarching objectives: an economic objective – to help build a strong, responsive and competitive economy, a social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations, and an environmental objective to contribute to protecting and enhancing our natural, built and historic environment. This includes making effective use of land and helping to improve biodiversity.
- Section 6 – ‘Building a strong, competitive economy’ emphasises the need for the planning system to help create conditions where businesses can invest, expand and adapt in order to support the need for economic growth and productivity. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- Section 9 – Promoting sustainable transport – this section states that opportunities to promote walking, cycling and public transport use should be pursued.
- Section 12 – Achieving well-designed places. The creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.
- Section 14 – Meeting the challenge of climate change, flooding and coastal change. In addition to supporting the increased use of renewable and low carbon energy and reducing greenhouse gas emissions, including complying with local sustainability requirements, flood risk should not be increased elsewhere and sustainable drainage systems should be incorporated in major developments.
- Section 15 – Conserving and enhancing the natural environment. Planning policies and decisions should contribute to and enhance the natural and local environment, including protecting and enhancing valued landscapes and biodiversity, and recognising the intrinsic character and beauty of the countryside. Development should also not add to or be at risk from pollution.

4.2 The Crawley Borough Local Plan 2015 - 2030

Policy SD1 (Presumption in Favour of Sustainable Development) The Council will take a positive approach, in line with the planned approach to Crawley new town, to approving development which is sustainable and work proactively with applicants, stakeholders and other partners to find solutions. Development will be supported where it meets strategic objectives including becoming carbon neutral and addressing climate change; complementing the town’s compact character and neighbourhood principles; respecting heritage; protecting and enhancing Green Infrastructure; creating a safe environment; providing for social and economic needs; and according with the Plan’s policies and objectives.

Policy CH2 (Principles of Good Urban Design) Proposals must support locally distinctive development patterns, landscape character and heritage; create defined frontages and public/private areas; create safe and attractive routes for all; connect places for people and integrate land use and transport; provide recognisable routes and landmarks; consider flexible development which responds to changing needs; provide diversity and choice to create viable places and meet local needs.

Policy CH3 (Normal Requirements of all New Development) Development should be based on a thorough understanding of the significance and distinctiveness of the site and its wider context and demonstrate how attractive or important features of the site will be retained. These include views, landmarks, footpaths, rights of way, trees, green spaces, hedges, other historic landscape features or nature conservation assets, walls and buildings. Developments will also need to be of high quality in terms of their urban, landscape and architectural design and relate sympathetically to their surroundings in terms of scale, density, height, massing, orientation, views, landscape, layout, details and materials. Development should also provide/retain a good standard of amenity for future

occupants and not cause harm to the amenity of the surrounding area, including through traffic generation and general activity. Development should demonstrate compliance with Secured by Design and meet the requirements for its safe and proper use, in particular in regard to access, circulation and manoeuvring and in this case vehicle parking. Individual or groups of trees that contribute positively to the area should be retained and, where any are lost, replacement tree planting should accord with the standards set out in policy CH6.

Policy CH4 (Comprehensive Development and Efficient use of Land) Development proposals must use land efficiently and not unduly restrict the development potential of adjoining land, nor prejudice the proper planning and phasing of development.

Policy CH6 (Tree Planting and Replacement Standards) Sets out that where development would result in the loss of trees, these should be identified and replaced to mitigate the visual impact from the loss of canopies. The requirement for replacement trees is based on the size of the trees to be lost and this is expected to take place on site or be subject to commuted payments for planting elsewhere. The Manor Royal Design Guide sets out tree planting requirements for that area.

Policy CH8 (Important Views) states that 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 points from which the view can be enjoyed must remain unobstructed by development in the foreground. Where the view is to an identified feature, development is required to protect and/or enhance this feature.

Policy EC1 (Sustainable Economic Growth) - This policy supports Crawley's role as the key economic driver for the Gatwick Diamond area and supports business growth. The policy seeks to ensure that Crawley's recognised economic role and function is maintained and enhanced through building upon and protecting the established role of Manor Royal as the key Business (B1), General Industry (B2) and Storage and Distribution (B8) location for Crawley and ensuring that it is the focus for sustainable economic growth. The policy sets out the need for approximately 23 hectares of employment land over the plan period.

Policy EC2 (Economic Growth in Main Employment Areas) recognises the significant contribution that the town's employment areas make to its economy and that of the wider area, and protects against net loss of employment floorspace.

Policy EC3 (Manor Royal) Manor Royal is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond. Development that is compatible with the area's economic function and role in the wider sub-region will be permitted where it falls within the B Use Class and would result in the reuse, intensification, or change of use of the land or buildings. Proposals that are not for B Use Class development will be permitted at Manor Royal if it can be demonstrated that they are of a scale and function that enhances the established role and business function of Manor Royal and would not undermine the business district. All development at Manor Royal should contribute positively to the overall setting and environment of the Main Employment Area as a business district through high quality design and landscaping that is in accordance with the Manor Royal Design Guide Supplementary Planning Document.

Policy ENV1 (Green Infrastructure) states that Crawley's multi-functional green infrastructure network will be conserved and enhanced through a number of measures including maximising opportunities to maintain and extend infrastructure links and requiring large proposals to provide new, or create links to, green infrastructure where possible.

Policy ENV2 (Biodiversity) All development will be expected to incorporate biodiversity features where appropriate and enhance existing features of nature conservation value around the development.

Policy ENV6 (Sustainable Design and Construction) All development must consider how it can address sustainability through reducing energy consumption, using renewable and low carbon energy, improving existing buildings when adding extensions, minimising carbon emissions during development and ensuring embedded carbon is retained and considering District Heat Networks,

water stress and temperature extremes. A Sustainability Statement should be submitted demonstrating how sustainability has been addressed through design and construction.

Policy ENV7 (District Energy Networks) Major developments within a Priority Area for District Heat Networks should demonstrate how they have addressed the hierarchy supporting creation of networks. Manor Royal is identified on the Proposals Map as a Priority Area.

Policy ENV8 (Development and Flood Risk) proposals on all sites of 1 hectare or greater are to be accompanied by a Flood Risk Assessment, to include detail of mitigation demonstrating how surface water drainage from the site will be addressed.

Policy ENV9 (Tackling Water Stress) Non-residential development, where technically feasible and viable, should meet BREEAM Excellent including addressing maximum water efficiencies under the mandatory water credits.

Policy ENV10 (Pollution Management and Land Contamination) ensures that new development does not increase levels of pollution or hazards and is appropriate to its location. Where a site may be at risk from contaminants or hazardous materials, information must be provided on how the risk will be addressed and pollution treated or removed.

Policy ENV11 (Development and Noise) states that people's quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources.

Policy ENV12 (Air Quality) states that proposals that do not have a negative impact on air quality will normally be permitted.

Policy IN1 (Infrastructure Provision) Development must be supported by necessary on and off site infrastructure, including mitigation where needed, to avoid harmful impact upon existing infrastructure.

Policy IN2 (Strategic Delivery of Telecommunications Infrastructure) requires proposals to be connected to high quality communications infrastructure.

Policy IN3 (Development and Requirements for Sustainable Transport) Development should be focussed to achieve sustainable transport through use of public transport, walking and cycling. Development should meet the access needs generated and not have unacceptable impact on congestion or highway safety. Proposals should be supported by a Transport Statement/Assessment.

Policy IN4 (Car and Cycle Parking Standards) Proposals should provide the appropriate car and cycle parking required by supplementary guidance.

4.3 Emerging Crawley Borough Local Plan 2021 – 2037 (January 2021)

The Local Plan Review Submission Consultation draft 2021-2037 has been published for Regulation 19 consultation on 6 January 2021, and therefore limited weight should be given to the following applicable policies:

- Policy SD1: Presumption in Favour of Sustainable Development.
- Policy CL2: Making Successful Places: Principles of Good Urban Design.
- Policy CL3: Movement Patterns, Layout and Sustainable Urban Design
- Policy CL7: Important and Valued Views.
- Policy DD1: Normal Requirements of All New Development.
- Policy DD2: Inclusive Design
- Policy DD4: Tree Replacement Standards
- Policy DD5: Aerodrome Safeguarding
- Policy IN1: Infrastructure Provision.

- Policy IN3: Supporting High Quality Communications.
- Policy EC1: Sustainable Economic Growth.
- Policy EC2: Economic Growth in Main Employment Areas.
- Policy EC3: Manor Royal
- Policy EC5: Employment and Skills Development
- Policy EC6: High Quality Office Provision
- Policy GI 1: Green Infrastructure
- Policy GI 3: Biodiversity and Net Gain.
- Policy SDC1: Sustainable Design and Construction.
- Policy SDC2: District Energy Networks.
- Policy SDC3: Tackling Water Stress.
- Policy EP1: Development and Flood Risk.
- Policy EP3: Land and Water Quality
- Policy EP4: Development and Noise.
- Policy EP5: Air Quality
- Policy EP6: External Lighting
- Policy ST1: Development and Requirements for Sustainable Transport.
- Policy ST2: Car and Cycle Parking Standards.

4.4 Planning and Climate Change SPD – Adopted October 2016

This provides further guidance on addressing the sustainability policies within the Local Plan, with examples of best practice and how to demonstrate compliance with the policies.

4.5 Green Infrastructure SPD – Adopted October 2016

This SPD provides further guidance on new and replacement tree planting, protection of existing trees, biodiversity and wider landscaping issues.

4.6 Urban Design SPD – Adopted October 2016

This document provides further advice on the principles of good urban design in the Crawley context, highlighting in particular the importance of massing and materials, public realm, street design and parking and sustainable design.

In respect of non-residential development, para 3.62 states:

“The layout of non-residential development is particularly important to their success. This should address the street and the public realm in a considerate manner and not turn their back on the existing streetscape and layout of the town. The appropriate scale and massing of the development will depend on the location and existing urban fabric. Active frontages are particularly important to the vitality of the streetscape and the success of commercial and retail uses and should be incorporated within the design from the start”.

For industrial and commercial development consideration should be made of appropriate materials, colours and massing to improve the architectural language (as buildings are often designed functionally with little architectural merit). Greater consideration of the layout of the buildings to the street is encouraged along with opportunities to improve the urban environment and use of landscaping.

Annex 1 of the SPD contains the Borough’s indicative minimum parking standards. For sites in Manor Royal the following standards apply for warehousing (B8):

Car parking – 1 space per 100 sq m

Lorry parking – 1 space per 500 sq m

Disabled parking – 1 space or 5% total provision

Cycle parking – 1 space per 500 sq m for staff and 1 space per 1000 sq m for visitors

Motorcycle parking – 1 space per 10 car parking spaces.

4.7 Manor Royal Design Guide SPD and Public Realm Strategy – Adopted July 2013

This document aims to support economic growth in Manor Royal, providing guidance to ensure that new development makes a significant contribution to the uplift of the area and secures delivery of high quality development which supports the key business function. It requires all development to demonstrate the following:

- New buildings to be of high quality urban design
- Proposals seek to provide active frontages to routes
- Materials and finishes of good quality and support the principles of identity and sustainability
- Proposals to achieve a high level of security
- Surface Water drainage considered
- Water efficiency measures considered
- The development must positively contribute to the landscape and identity of Manor Royal.

The document emphasises the importance of landscaping as a key consideration in creating a sense of place for Manor Royal and improving the quality of the public realm. A key approach to delivering these improvements is achieving robust and consistent frontages to improve the quality of the environment. It requires parking and servicing to be adequate to meet the needs of the development and to consider landscaping and seek to reduce monotonous surfacing of parking areas. Boundary treatments must be appropriate in scale and context, with landscaping to reduce the visual impact of fences and barriers.

The Crawley Business Quarter is identified as 'other minor roads' which states that all developments should demonstrate the following:

- Enhance the visual experience of the local road network
- Create a more legible relationship between roads and pavements, benefiting vehicle users and pedestrians
- Create seasonal interest through landscaping that also improves the clarity in the hierarchy of the road network.

The site is identified as being within the Core Business Zone Character Area A. Key considerations that proposed development in such locations should seek to address are to:

- Maintain the spacious setting of buildings;
- Build on the positive impact of high quality public realm and development through promoting high quality buildings that also improve the private realm;
- Provide active frontages, high quality materials, and planting of high aesthetic quality and durability; and
- Given the spacious and prominent nature of the area, explore the potential for taller buildings with due regard to the safeguarding requirements of Gatwick Airport.

4.8 Developer Contributions Guidance Note (published July 2016)

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. The document also sets out the Manor Royal contribution requirement towards the public realm in this area which is at a cost of £2 per sqm of new floorspace.

PLANNING CONSIDERATIONS:-

5.1 The main planning considerations are as follows:

- Principle of the development
- The design and appearance of proposal and impact on the street scene and wider area
- The impact on nearby occupiers/neighbours
- The impact on the highway, parking and the operational requirements of the site
- Landscaping, Trees and Ecology
- Sustainability
- Air Quality & Noise
- Flood Risk and Drainage
- Contaminated Land

- Developer contributions
- Gatwick Airport safeguarding

Principle of the development

- 5.2 Local Plan Policy EC1 set outs that the overarching policy objective is to ensure that Crawley's economic role and function is maintained and enhanced, retaining and maximising the available supply of employment land in order to support economic growth and enable existing and new businesses to grow and prosper. The policy identifies a requirement for an additional 57.9ha business land in Crawley over the Plan period to 2030. As a result of Crawley's constrained land supply position, it identifies an available business land supply pipeline of only 23ha, and therefore a business land supply shortfall of 35ha over the Plan period to 2030. Since Local Plan adoption, available business land has continued to reduce as sites are built out, and the land supply pipeline is currently 17.56ha, as per the Employment Land Trajectory (Base Date 1 September 2020).
- 5.3 The scarcity of available employment land within the Borough and subsequent business land supply deficit place particular weight on the need to build upon and protect the role of the designated Main Employment Areas (MEAs). Local Plan Policy EC2 recognises the significant contribution made by the MEAs to the economy of Crawley and the wider economic sub region, identifying these locations as the focus for sustainable economic growth, and seeking to protect and enhance their employment function. Where proposals would result in a loss of employment floorspace, the specific policy criteria must each be met.
- 5.4 This application would result in a net loss of employment floorspace, due to the proposed demolition of the existing 13,754sqm office building and its replacement with approximately 7800sqm of B8 warehouse unit. The current scheme would represent a substantial loss of floorspace compared to the marginal amount suggested at pre-application discussions. As required, the applicant has submitted information to provide context against the loss of employment floorspace criteria in Policy EC2. These are discussed below.

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

The applicant has acknowledged that the proposed development would result in a net loss of employment floorspace, though is of the view that any floorspace reduction should be considered within the context of what is a significant need for B8 warehouse units and the retention of the site for business use. The applicant also sets out its view that a net loss of floor space is inevitable where a multi storey office building is being replaced by a B8 warehouse use.

In this regard, it is recognised that there is a significant need for new Class B8 land and floorspace in Crawley, with the Crawley Focussed Economic Growth Assessment (2020) identifying need for at least 32.8ha new industrial (B1c/B2/B8) employment land. The applicant's office market report advises that the existing office floorspace is largely vacant, and having been subject to partial refurbishment and marketing, has attracted only limited interest. This reflects the council's own evidence base, with the Manor Royal Economic Impact Study 2018 finding that refurbished office accommodation, even where this is providing a good quality of accommodation, can also be met with limited market demand as a result of out-dated building configurations and large floor plates that do not meet current business needs. The Northern West Sussex EGA 2020 also discusses the current challenging office market conditions, whereby the available supply is largely composed of older Grade B stock that does not match the market demand for new Grade A stock.

The NPPF para 81(d) requires planning policies to enable a rapid response to changes in economic circumstances, and in this regard it is considered that the accommodation in the existing office building does not meet current business demands, and that the refurbishment of the building for office use (irrespective of viability) would not necessarily remedy this situation given market conditions. The application, whilst resulting in (for operational reasons) an overall loss of employment floorspace, would retain the site in business focussed employment use, bringing what is a currently under-utilised site into active employment use, and would help to meet an identified need for B8 warehouse floorspace.

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

It is recognised that redevelopment of this site would enable Hermes to relocate from its existing Woolborough Lane site to a larger premises, enabling expansion of the business and creation of an estimated 67 additional full time jobs. NPPF para 82 requires planning decisions to address the 'specific locational requirements of different sectors...making provision for...storage and distribution operations at a variety of scales'. As such, there would be clear economic benefits from this proposal. There would also appear scope for the development to deliver wider social and environmental benefits through appropriate design and landscaping and sustainability measures.

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

As discussed at (i) above, the existing office building is largely vacant, and given the nature of the office market, even refurbishment to Grade A status may still face challenges in securing occupiers. Given that the development would retain the site in employment use and would contribute to accommodating the need for warehouse units, although providing a reduced amount of floorspace, it is not considered that the partial loss of employment floorspace would undermine the function of Manor Royal as an MEA, nor the wider economic function of Crawley.

- 5.5 Having regard to the above, the proposed development, although resulting in a significant loss of employment floorspace, would retain the site in business focussed employment use, helping to meet what is a significant B8 floorspace need for Crawley. It would also support the expansion of an existing Manor Royal business and create new job opportunities. It is therefore considered that, on balance, the criteria of Policy EC2 are met.
- 5.6 Local Plan Policy EC3 focuses specifically on Manor Royal, supporting the delivery of business uses in this location, seeking to protect and reinforce its core business function by promoting development within the B-use classes, and encouraging the reuse and intensification of land or buildings within the main employment area. The policy requires development to contribute positively to the overall setting and environment of the main employment area as a business district through high quality design and landscaping that is in accordance with the Manor Royal Design Guide Supplementary Planning Document. In proposing B class employment development in Manor Royal, and encouraging the re-use of this largely vacant site, the application is consistent with Policy EC3. Given the net loss of employment floorspace, a Manor Royal Contribution would not be charged in this instance.
- 5.7 In conclusion this application would deliver business focussed employment use within Manor Royal, and is in principle supported. The key issue centres on the loss of what is a significant amount of employment floorspace arising from the replacement of the existing office building in favour of a new B8 storage and distribution warehouse. Given the challenges faced by the office market, the need to respond to changing economic circumstances, and that redevelopment of the site would help meet an identified need for warehouse units in Crawley, it is considered that the proposed reduction in employment floorspace at the site is in this instance justified. More broadly, the application would deliver wider economic benefits, bringing a largely vacant site into beneficial employment use, supporting the retention and expansion of an existing employer, and delivering new jobs. Therefore, it is considered that on balance, the loss of office floorspace is justified given the wider economic benefits that would be delivered through the proposed B8 scheme.

The design and appearance of the proposal and impact on the street scene and wider area

- 5.8 Policies CH2, CH3 and EC3 require that all development should contribute positively to the overall setting and environment of Manor Royal through high quality design and landscaping. Policy EC3 specifically makes reference to the Manor Royal Design Guide SPD (MRSPD), and it affords this document significant weight. The design and landscaping of any development at this site would need to be carefully considered, given its location.
- 5.9 The site is located centrally within the Crawley Business Quarter. The Manor Royal Design Guide identifies this area as being within the Core Business Zone Character Area A. The key considerations are that the proposed development in such locations should seek to address are to:
- Maintain the spacious setting of buildings;

- Build on the positive impact of high quality public realm and development through promoting high quality buildings that also improve the private realm;
 - Provide active frontages, high quality materials, and planting of high aesthetic quality and durability; and
 - Given the spacious and prominent nature of the area, explore the potential for taller buildings with due regard to the safeguarding requirements of Gatwick Airport.
- 5.10 The proposed building would be offset to the east of the site with hardstanding and parking to the north, south and west. The building would measure 61.5m in width, 116m in length and 16.1m in height. The entrance to the south would lead to a parking area for cars, cycles and motorcycles. To the north would be the entrance / exit to the site for lorries and vans as well as a lorry / van parking area. The central section would form the operational area of the site and would include loading bays and lorry parking spaces. The yard and northern parking area of the site would be enclosed with 2.4m paladin fencing. Landscaping is proposed on the north, south and western boundaries and would also separate the southern parking area from the central yard area.
- 5.11 The proposed building would be commercial in nature however it has been designed so that it is not a typical large 'shed' style building which one would normally associate with such uses. It is proposed to use composite cladding in varying shades of grey, and blue with large glazing panels on the entrance of the building. The cladding would be laid both vertically and horizontally to provide depth and texture creating a building of high quality. The careful use of materials with varying colours and patterns would provide relief and punctuation which would help to break up the mass of the built form.
- 5.12 The landscaping buffer on the road frontages (discussed in more detail in paras 5.29 – 5.37) would also integrate the building within the surrounding locality. Whilst the site is visible in the surrounding area due to its position in relation to the road network, the main views would be from the north and south as one approaches the site. In this respect the landscaping is important to soften the impact of the built form. The building would be lower than the existing structure on the site and lower than those surrounding it and would be similar in character to the BOC buildings to the immediate east. Overall, it is considered that the site can comfortably accommodate a building of this scale, particularly given the scale of the existing building.
- 5.13 In regard to the possible impact in terms of long distance views from Target Hill, the proposed development would be significantly smaller than the building that it would be replacing therefore the proposal would have less of an impact than the current situation. As such the proposal would not adversely impact on the long distance views.
- 5.14 Overall, it is considered that overall the design and layout of the building is appropriate within the context of the main employment area. Whilst it is a large, relatively plain building, this reflects its function and purpose and the design has been improved on the north and south elevations to provide more interest. It is considered the development would create a high quality public realm with the landscaping proposals. As such the proposal would accord with the relevant policies within the Crawley Borough Local Plan and the Manor Royal SPD.

The impact on nearby occupiers/neighbours

- 5.15 The nearest occupiers to the proposed development are those to the east of the site, within the 'BOC' development which comprises of two warehouse buildings adjacent to the eastern boundary of the application site. A small path is proposed to be retained on this eastern boundary of the application site for maintenance/access. It is considered that given that the proposed use would be a warehouse building which would be compatible to the adjacent warehouse use to the east, the proposal would not result in an adverse impact on these adjacent commercial buildings.
- 5.16 Given that the surrounding area is industrial and commercial in its nature and appearance, immediate neighbours are therefore unlikely to suffer disturbance from the proposal. There are no residential dwellings in the near vicinity, it is therefore considered that the proposed development would not be detrimental to the amenities of neighbouring occupiers. As such the proposal would accord with development plan policy in this regard.

The impact on users of the highway, parking and the operational requirements of the site

- 5.17 The site is currently occupied by a 13,710sqm office building which has historically been home to Virgin Atlantic. The development proposals consist of the redevelopment of the site to provide a 7,800sqm (approx) parcel distribution warehouse within the B8 use class for use by Hermes. The development proposals would include parking on site for employees as well as HGV parking and HGV loading bays.
- 5.18 The site currently has 4 points of access onto the private access road known as Crawley Business Quarter. The site is primarily accessed via two roundabouts to the north and south of the site, there are additionally two secondary accesses located on the western edge of the site which are used to access the existing car park areas.
- 5.19 A series of changes are proposed to the access arrangements at the site to suit the proposed B8 use and the passage of HGVs into and out of the site. The main changes to the northern access would be to create an in and out configuration which would only be used for HGVs and LGVs to access the service yard. It is anticipated that HGVs would approach and leave the site via Fleming Way. It is also proposed that the existing informal pedestrian crossings will be upgraded to be formal zebra crossings. In regard to the southern access, the existing access would be retained and would be used for the staff car park and the office element of the proposal. These vehicles would enter and exit from this access point. The cycle parking would be accessed from the south, originally the cycle parking was located adjacent to the building but it has been relocated so that it is adjacent to the zebra crossing at the front of the site. This makes the spaces more accessible for cyclists with easy access to the building. In addition to above, the two existing secondary accesses on the western boundary of the site will be closed and the footway reinstated.
- 5.20 The site will in effect be divided into two parts with the staff parking contained to the south of the site and with the yard area and lorry / van park to the north. Landscaping is proposed to separate the two areas.
- 5.21 In regard to the required parking arrangements proposed with this application, this is set out in the table below

Cars (1 space per 100sqm) Disabled(a minimum of one space or 5% of total parking provision)		Lorries (and vans) (1 space per 500sqm – 1 space minimum)		Cycle (1 space per 500sqm for staff, 1 space for 1000sqm for visitors)		Motorcycle (1 space minimum+1 space / 10 car parking spaces)	
Standards	Provision	Standards	Provision	Standards	Provision	Standards	Provision
78 (including 5 disabled)	95 (including 6 disabled)	16	48 (spaces) 22 (docking bays)	24	24	11	12

- 5.22 The 95 car parking spaces would be laid out within a car park to the south of the site. Of the 95 spaces, 20 would be electric vehicle charging spaces, 6 would be disabled bays and 9 would be car sharing spaces. 11 motorbike spaces would be located to the far south of the car park and 24 cycle spaces adjacent to the access and egress to the site. The 48 HGV/LGV parking would be located along the western and north eastern boundary of the site within the yard area which is separated from the car park by fencing and a hedge. The 22 docking spaces would be located on the north and west elevations of the building in front of the service doors.
- 5.23 Comparing the proposed provision to the required, the car and HGV parking is higher than the standards require, however the provision has been based on the operational needs of the user. The applicant advises that Hermes are not only relocating but also expanding throughput and employment numbers considerably. They have confirmed their intention to increase from about 158 jobs to about 225 jobs. The unit would operate 24 hours a day, with 3 shifts. At shift turnover during peak periods, up to around 2/3 of these staff may need to be on site, i.e. up to about 150. Their estimate is that this will require a higher number of spaces than the current minimum standard. While it is to be expected that the travel plan and accessibility improvements will reduce overall parking demand, the effectiveness of this will likely be limited when shifts cross over at night time.

- 5.24 The Local Highway Authority (LHA) were consulted on the application and advise that whilst the proposal would be offering more spaces than the proposed standards, this need for the additional spaces is based on operational need of Hermes. The LHA do not raise concern in this regard but advise that sustainable travel where possible must still be encouraged through the Travel Plan.
- 5.25 The accessible car parking spaces are provided to standard at 5% total provision and in addition, the applicants have considered the guidance in paragraph 110 of the NPPF, the WSCC 2019 guidance on 'Parking and New Development' and emerging local plan and provided EV charging parking spaces within the layout for 20% of the car parking spaces providing 20 spaces. These measures are considered a positive addition to future proof the development and encourage more sustainable forms of private vehicle travel.
- 5.26 In terms of the net traffic impact, the LHA advise that the proposed use would greatly decrease the number of trips on the highway network at peak times. However, it would increase the amount of operational HGV traffic to and from the site in the peak hours and across the whole day. Whilst there would be an increase in HGV trips during the peak periods the LHA do not consider that it would be at a level where further highway junction assessment modelling would be required.
- 5.27 The LHA requested further information regarding the proposed traffic distribution for the site which the applicant has provided. The LHA advise that given that the proposed development is intended to replace the existing Hermes depot, and also considering the previous use of the site with its associated trips it is not expected that there would be a significant impact on the local junctions that would affect capacity or safety and therefore they do not raise objection to the proposal. Conditions are requested regarding the submission of a construction management plan, cycle parking details, for the travel plan to be approved and for the vehicle parking and turning area to be implemented prior to occupation. Furthermore, the LHA require a contribution of £3500 for Travel Plan monitoring which would be secured by a S106.
- 5.28 In conclusion, the proposed number of cycle spaces and motorbike parking spaces would comply with the parking standards. Whilst there is a considerable overprovision of car parking spaces and HGV/LGV spaces, this is as a result of the specific needs of the end user and would be acceptable in this instance. The parking layout would be acceptable with the car park / cycle / motorbike spaces separated from the main yard area and the HGV/LGV spaces and loading bays. Therefore, subject to the above suggested conditions, it is considered that the proposal would not result in an adverse impact in regard to highway capacity or safety and as such would accord with development plan policies in this regard.

Landscaping, Trees and Ecology

- 5.29 Local Plan Policies CH2, CH3 and EC3, the Manor Royal SPD and supporting the Public Realm Strategy places considerable emphasis on enhancing private landscaped areas along the road frontages and internally within the sites. Policy ENV2 states that 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.
- 5.30 This site is designated within The Manor Royal Urban Design Guide as 'other minor roads' which states that areas beyond the Secondary and Primary roads are less prominent but are also important in defining the look, feel and experience of the Business District. Consistent general design guidance and provision of a landscaping buffer can improve public areas across the highway network and ensure there is quality interaction between private plots and the public realm. The SPD goes on to say that all developments on minor roads should demonstrate how they address the following:
- Enhance the visual experience of the local road network.
 - Create a more legible relationship between roads and pavements, benefiting vehicle users and pedestrians
 - Create seasonal interest through landscaping that also improves the clarity in the hierarchy of the road network

Whilst most of the existing soft landscaped areas are within private ownership, by considering the use of verges and making better use of space within the private realm, there is scope for areas of wildflower, groundcover and tree planting.

- 5.31 The application was supported by a Landscape Masterplan Strategy, An Arboricultural Impact Assessment and Method Statement, including a Tree Protection Plan and an Ecological Assessment. It is proposed to remove 50 individual / pairs of trees and 5 groups of trees. The trees to be removed vary from category C to U class trees with the exception of the following category B trees; a pair of paperback Birch trees (T11), a pair of Ash Trees (T18), a group of Ash trees (T30) and an Alder (T32). None of the trees are protected and they are not significant in terms of their size or age. Further the Ash trees are showing sign of ash die back. Policy CH6 requires 77 replacement trees to be planted, and 138 new trees are proposed.
- 5.32 Given the operational needs of the site, it is not proposed that there would be any planting within the main yard area of the site. The planting would be kept to the boundaries and within the staff parking area to the south. The existing landscaping buffer on the northern boundary is a maximum of 10.6m in length and on the west is 8m. The southern boundary is more informal and varies in depth. These boundaries are proposed to be strengthened by planting a mixture of 58 extra heavy standard trees and 80 standard trees. These would be native species of 14-16cm girth and 8-10 cm girth. Ornamental tree planting (4-4.5cm girth), shrubs and a native mixed species hedgerow. To the south of the site a native hedge is proposed on the boundary of the staff car park, tree planting is proposed within the parking area to break up the hardstanding and ornamental planting and native wildflower grassed areas are also proposed. To the east, there is little opportunity for planting given the location of the building with the boundary however this boundary is the least visible from the surrounding area and would be acceptable in this instance.
- 5.33 The proposed planting has been balanced against the operational requirements of the site. The landscaping has been improved on the boundaries of the site which would help to soften the appearance of the site when viewed from the surrounding area and the hardstanding to the south has been broken up by further planting. The proposed replacement planting of 138 trees coupled with the retention of the majority of the existing trees on the boundaries is such that the proposed landscaping and planting strategy would be acceptable subject to conditions requiring the protection of the retained trees during construction. Further the proposal would provide in excess of the number of replacement trees under Policy CH6 (77 required and 138 proposed).
- 5.34 In regard to the ecological impacts of the site, an ecological assessment and bat survey were submitted with the application which stated that the majority of the application site is of no intrinsic ecological value, comprising areas of built form and hardstanding. The small areas of amenity grassland and ornamental planting are considered to be of negligible ecological value given their small extent and limited species range. The report suggests that no specific mitigation would be required for the loss of these habitats.
- 5.35 A key component of the landscaping proposals will include for the extensive buffering of the western, northern and southern boundaries to both enhance its value as an ecological asset in its own right, as well as strengthening its links with connected Green Infrastructure within the wider area, including pockets of Ancient Woodland and the identified Ancient Hedgerow network. The ecological enhancements would include the use of flowering plants to encourage invertebrates, bat-friendly planting to increase foraging, native species-rich hedgerows on the site boundaries and within the car park to the south, green walls to the building by training climbing plants to grow up the building and the installation of bird and bat boxes.
- 5.36 The Ecologist was consulted on the proposal and advises that the report suggests that the proposals would provide for a net gain in biodiversity. However he does not consider that there would be any significant gain but he accepts that the modest amount of new habitat is capable of offsetting the loss of a modest amount of existing habitat, once matured which should be weighed against the local plan policy for net gain. He is satisfied with the results of the bat surveys and that no bats were present. A condition is suggested that the development is carried out in accordance with the recommendations set out within the Ecological Impact Assessment and subject to this, the proposal would be acceptable in this regard.

5.37 Policy ENV2 states that developments should incorporate features to encourage biodiversity where appropriate, and where possible enhance existing features of nature conservation. Given that the proposed re-planting far exceeds that which would be removed, coupled with the proposed ecological enhancements, it is considered that the removal of a number of trees would be acceptable in this instance. The proposal would therefore comply with the relevant Local Plan Policies and the Manor Royal SPD.

Sustainability

5.38 Policy ENV6 (Sustainable Design and Construction) states that all development must consider how it can address sustainability through reducing energy consumption, using renewable and low carbon energy, improving existing buildings when adding extensions, minimising carbon emissions during development and ensuring embedded carbon is retained and considering District Heat Networks, water stress and temperature extremes. Policy ENV7 (District Energy Networks) states that major developments within a Priority Area for District Heat Networks should demonstrate how they have addressed the hierarchy supporting creation of networks. Manor Royal is identified on the Proposals Map as a Priority Area. Policy ENV9 (Tackling Water Stress) states that non-residential development, where technically feasible and viable, should meet BREEAM Excellent including addressing maximum water efficiencies under the mandatory water credits.

5.39 The proposal is supported by an Energy and Sustainability Statement, including a BREEAM Pre-Assessment Document as an Appendix. The Energy and Sustainability Statement refers to the current adopted policies, and responds in the following terms:

- Building fabric is similar to the 'notional' Building Regulations compliant specification;
- Some improvements to energy efficiency of building services in relation to Building Regulations 'notional' requirements, e.g. more energy efficient lighting;
- Air Source Heat Pumps and mechanical ventilation with heat recovery are identified as the most appropriate technology for providing heating, cooling and ventilation to the office areas;
- Solar PV is also proposed for the roof area (as shown on the roof plans)
- In terms of EV charging infrastructure the proposal includes 'active charging points for up to 20 vehicles' and buried ducts 'to be provided to the remaining car parking spaces, for future installation of electric charging points'.
- In respect of policy ENV7 and District Energy Networks, the Statement identifies that there is no network currently in the vicinity. It continues: *The development has been designed to include a valved connection point for future connection to a district heat network via a plate heat exchanger, and future pipework routes have been considered. However, it is deemed that air source heat pumps offer an optimal low carbon solution to heating and cooling the office spaces and will offer further savings as the electricity grid continues to decarbonise.*

5.40 The proposed Strategy would achieve a reduction of 59% in energy consumption and 45% in CO2 emissions compared with baseline Building Regulations requirements. Allowing for 'unregulated' energy consumption (i.e. energy consuming equipment not covered by building regulations) these would fall to 31% and 20% respectively.

5.41 The Energy and Sustainability Officer advises that the strategy is considered acceptable. The report states that the future user would be responsible for connecting to the district network and that the proposed heat pump would be the heat source in the first instance. The plans show that an area would be safeguarded within the proposed building to allow for connection in the future and a condition is recommended to secure this. The BREEAM pre-assessment confirms that a level of performance which meets the ENV6 and ENV9 requirements is being targeted which can be secured via a condition. Conditions are also suggested in regard to the details of the solar PV array and electrical vehicle charging spaces.

Air Quality & Noise

5.42 The proposal is accompanied by an Air Quality Assessment that has considered the air quality impacts during the construction (dust and vehicle emissions) and the buildings' subsequent operational phases (traffic impacts on the local road network).

- 5.43 The Council's Air Quality officer comments that during the construction phase, dust emissions can be adequately managed by adopting appropriate mitigation measures. This can be covered in the Construction Management Plan condition. The Air Quality officer also notes that the cumulative impacts of this development combined with other traffic growth generally within the area may contribute to a creeping baseline which may lead to exceedances and to account for this the applicants also carried out an Emissions Mitigation Assessment to calculate the cost of this damage from increased emissions from this development and appropriate mitigation to offset this damage.
- 5.44 The total cost was calculated at £127,164. This relates to the value of mitigation that should be applied to offset these adverse effects. It is recommended that these measures are secured by a s106 legal agreement in order to address these air quality issues. The package of measures would be a combination of both on-site and off-site proposals. The additional on-site mitigation measures are required to be over and above existing policy requirements.
- 5.45 Since this analysis was done, the applicants have reviewed the figures and at the time of writing this report have just submitted a new Air Quality Assessment. This is currently being considered by the Air Quality officer and an update will be given at the Committee meeting.
- 5.46 In regard to the noise impacts of the development, given that the site would be located within an existing industrial estate and would be used for warehousing and distribution, the proposal would not result in any adverse noise impacts and there are no residential properties within close proximity to the site.
- 5.47 Overall, subject to conditions and a s106 agreement the proposal would not result in an adverse impact upon air quality or noise and would therefore accord with Local Plan Policy ENV12.

Flood Risk and Drainage

- 5.48 The proposed development site is a brownfield site with buildings and the majority of the remaining site area laid to hardstanding. The site is located within Flood Zone 1 and is an area with low potential of flooding. The existing developed site has several surface water drainage connections to Thames Water infrastructure. The submitted Flood Risk Assessment and Drainage Strategy shows that sustainable drainage techniques in the form of below ground attenuation with a restricted discharge to the main Thames Waters sewer as well as permeable paving to the staff car park.
- 5.49 Thames Water have advised that in regard to foul water that there is sufficient sewerage capacity to accommodate the development. In regard to surface water, they advise that they will only connect once it has been demonstrated that the hierarchy of disposal methods has been examined and approved by the lead local flood authority. The Council's Drainage Officer raised no objection to the proposal and confirmed that based on the impervious nature of the soil strata and the distance to a watercourse, the feasible option will be a connection of the surface water discharge to a public sewer asset such as Thames Water. The Drainage officer requires the submission of a construction drainage and environment management plan prior to the commencement of the development.
- 5.50 Subject to conditions it is considered that the proposal would not result in an adverse impact in regard to flood risk or drainage in accordance with Local Plan Policy ENV8.

Contaminated Land

- 5.51 A Preliminary Phase 2 Contaminated Land Risk Assessment was submitted with this application. This indicates that the ground under the existing floor slab may require further intrusive investigation following demolition works. It is understood intrusive works have been undertaken and that no remediation works are suggested based on the results of the investigation and future surfacing of the site. It is further understood that not all the site was available for intrusive works and that more investigation is to be undertaken.
- 5.52 The recommendations and analysis detailed in the submitted report are considered acceptable in principle, but the report states that further investigation is required. As a result, the Environment

Agency raised no objection, but request a condition advising that should contamination not previously identified is found to be present at the site then no further development shall be carried out until a remediation strategy is approved. The Council's Contaminated Land Officer has no objection to the proposal subject to a condition relating to a 3-stage risk based approach relating to risk assessment, options appraisal and remediation & verification.

- 5.53 Therefore, the proposal, subject to conditions requiring the submission of a 4 stage contaminated land strategy to be submitted prior to the commencement of the development as well as a condition requiring work to stop immediately should any contamination be found, the proposal would not result in an adverse impact regarding contamination and is considered acceptable in this regard.

Developer contributions

- 5.54 A S106 agreement is required to secure the following matters:

- Travel Plan monitoring fee of £3500
- Air Quality Mitigation measures to a value of £127,164 to include both on-site and off-site mitigation measures

- 5.55 In regard to a Manor Royal contribution towards public realm improvements, the proposal would result in a reduction in business floor space therefore a contribution would not be required in this regard.

Gatwick Airport safeguarding

- 5.56 Gatwick Airport Safeguarding and NATS have both commented on the application. NATS has no objection. GAL Safeguarding has no objection, subject to conditions to address: the implementation of the Bird Hazard Management Plan, submission of a detailed landscaping scheme to ensure that the amount of be fruit/berry bearing species would not exceed 40% of the total planting, submission of details for the PV, and a cranes informative. All these conditions are recommended accordingly.

CONCLUSIONS:-

- 6.1. The use of the site is in principle supported by Local Plan policies and would have a potentially positive impact in terms of the local economy. The building design, size, massing, materials and landscaping would be considered acceptable within Manor Royal. Given the proposed landscape strategy and proposed ecological enhancements, it is considered that the removal of several trees would be balanced against the overall benefits of the development. The specific operational needs of the site and this operator in terms of access, car, lorry, cycle and motorcycle parking can be met, and the Local Highway Authority have confirmed there are no objections in terms of impact upon road capacity or highway safety. The proposals relating to drainage, air quality, and contaminated land would also be acceptable, subject to conditions, and the sustainability measures would provide a BREEAM excellent rating for water and energy credits.
- 6.2. Subject to the completion of the S106 legal agreement for the Travel Plan monitoring fee and air quality mitigation measures, it is considered that the proposal would accord with the relevant sections of the NPPF the relevant policies of the Local Plan 2015-2030 and relevant Supplementary Planning Guidance. On this basis it is recommended that planning permission be granted.

RECOMMENDATION RE: CR/2021/0247/FUL

PERMIT - Subject to the conclusion of a Section 106 legal agreement, and subject to the following conditions:-

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission.
REASON: To comply with Section 91 of the Town & Country Planning Act 1990.
2. The development hereby permitted shall not be carried out other than in accordance with the approved plans as listed below save as varied by the conditions hereafter:

(Drawing numbers to be added)

REASON: For the avoidance of doubt and in the interests of proper planning.

3. The development hereby permitted shall be used solely for the purposes of Use Class B8 (Storage or Distribution) and not for any other use as defined by the Town and Country Planning (Use Classes) Order 1987 (as amended), without the prior written consent of the Local Planning Authority
REASON: To ensure that there is adequate parking and servicing provision on the site to reflect the use in accordance with Policies IN3, IN4 and CH3 of the Crawley Borough Local Plan 2015 - 2030 and the Urban Design Supplementary Planning Document.
4. Before any work for the implementation of this permission commences, detailed plans and particulars of the land levels and the finished floor levels of the buildings shall be submitted to and approved in writing by the Local Planning Authority, and the building shall be constructed in accordance with the approved levels.
REASON: To enable the Local Planning Authority to control the development in detail in the interests of amenity in accordance with Policy CH3 of the Crawley Borough Local Plan 2015-2030.
REASON FOR PRE-COMMENCEMENT: This condition is required pre-commencement as it relates to the site layout and how building will be constructed.
5. Prior to the commencement of the development hereby permitted, a Construction, Drainage and Environment Management Plan shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the approved Plan shall be implemented and adhered to throughout the entire construction period. The Plan shall provide details as appropriate but not necessarily be restricted to the following matters,
 - the anticipated number, frequency and types of vehicles used during construction,
 - the method of access and routing of vehicles during construction,
 - the parking of vehicles by site operatives and visitors,
 - the loading and unloading of plant, materials and waste,
 - the storage of plant and materials used in construction of the development,
 - the erection and maintenance of security hoarding,
 - the provision of wheel washing facilities and other works required to mitigate the impact of construction upon the public highway (including the provision of temporary Traffic Regulation Orders),
 - details of public engagement both prior to and during construction works.
 - the management of surface water during construction
 - details of biodiversity and mitigation measures during site clearance, demolition and construction.REASON: In the interests of highway safety, ecology, drainage and the amenities of the area in accordance with Policy IN3 and CH3 of the Crawley Borough Local Plan 2015 - 2030.
REASON FOR PRE-COMMENCEMENT: This condition is required pre-commencement to ensure appropriate arrangements are in place to manage construction vehicles and related construction traffic arriving at the site and to ensure the potential impacts upon the amenity of the area, drainage and ecology are controlled.
6. The development hereby permitted shall be carried out in accordance with the Air Quality Assessment in particular Table 22 - Mitigation of Construction Activities, dated July 2021 submitted with the application which must be implemented during the construction of the development .
REASON: To ensure that the development does not have a negative impact on Air Quality in accordance with Policy ENV12 of the Crawley Borough Local Plan 2015 - 2030.
7. The development hereby permitted shall be carried out in accordance with the Travel Plan ref 2021/5819/TP02 dated June 2021 submitted with the application. Only the approved details shall be implemented.
REASON: To encourage and promote sustainable transport in accordance with Policy IN3 of the Crawley Borough Local Plan 2015 - 2030.
8. Prior to the occupation of the development hereby permitted the car, motor cycle and lorry parking spaces (including the electric vehicle charging spaces) and the turning and manoeuvring areas shall be constructed in accordance with the approved plans. These spaces and areas shall thereafter be retained for their designated use.

REASON: To provide adequate on-site car parking and turning space for the development in accordance with Policy IN3 of the Crawley Borough Local Plan 2015 - 2030.

9. Prior to the first occupation of the development hereby permitted, plans and elevation shall be submitted to and approved in writing by the Local Planning Authority for:

- (i) sheltered cycle parking spaces,
- (ii) details of the storage of refuse / recycling provision
- (iii) details of the substation and transformer plants.

The agreed details must be laid out and available prior to first occupation of the development and retained for the life of the development unless otherwise approved in writing by the Local Planning Authority.

REASON: In the interests of visual amenity and to ensure the operational and servicing requirements of the development are met in accordance with policy CH3 of the Crawley Borough Local Plan 2015-2030.

10. No infiltration of surface water drainage into the ground is permitted other than with the written consent of the Local Planning Authority. The development shall be carried out in accordance with the approved details.

REASON: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution caused by mobilised contaminants in line with Policy ENV10 of the Crawley Borough Local Plan 2015-2030 and paragraph 170 of the National Planning Policy Framework.

11. The development hereby permitted shall be implemented and thereafter maintained and managed in accordance with the Flood Risk Assessment and Drainage Strategy provided by PRK UK Ltd and dated 30 March 2021, including a reduction of 50% of the pre development surface water flow rate as part of the surface water management plan, unless otherwise agreed in writing by the Local Planning Authority.

REASON: This is a major development and the performance of the drainage system must be future proofed to avoid flooding within the development and subsequent flood risk to other areas close to the development site in accordance with Policy EN8 of the Crawley Borough Local Plan 2015 - 2030.

12. Prior to the occupation of the development hereby permitted, a post construction certification shall be submitted to and approved in writing by the Local Planning Authority. This shall confirm that the works including the SuDS features proposed in the FRA and Drainage Statement have been constructed as stated. This shall be carried out by a third party.

REASON: This is a major development and the performance of the drainage system must be future proofed to avoid flooding within the development and subsequent flood risk to other areas close to the development site in accordance with Policy EN8 of the Crawley Borough Local Plan 2015 - 2030.

13. The development hereby permitted shall be carried out in accordance with the Tree Survey and Impact Assessment dated March 2021 ref: 1610-KC-XX-YTREE Rev 0 submitted with the application. The tree protection measures as set out within Section 6 of the report must be implemented prior to the commencement of the development and thereafter maintained for the duration of the construction works.

REASON: To ensure that the existing trees are not compromised during the construction of the development in accordance with Policy CH3 and CH6 of the Crawley Borough Local Plan 2015 - 2030. This condition is required pre-commencement as it relates to the site layout and how building will be constructed.

14. No above ground development shall take place until full details of soft landscaping works have been submitted to and approved in writing by the Local Planning Authority. These details shall include:

- Grassed areas
- The species, number and spacing of trees and shrubs
- Hedging

The approved details of the landscaping shall be carried out in the first planting and seeding season following the occupation of the building or the completion of the development, whichever is the sooner, and any trees or plants which within a period of five years from the completion of the development die, are removed, or become seriously damaged or diseased shall be replaced in the next planting season with others of similar size and species, unless the Local Planning Authority gives written consent to

any variation. No subsequent alterations to the approved landscaping scheme are to take place unless submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented as approved.

REASON: In the interests of amenity and of the environment of the development and to avoid endangering the safe movement of aircraft and the operation of Gatwick Airport through the attraction of birds and an increase in the bird hazard risk of the application site in accordance with Policies CH3 and IN1 of the Crawley Borough Local Plan 2015 - 2030.

15. Prior to the first occupation of the development, a Landscape Management Plan which covers a period of no less than 15 years shall be submitted to and approved in writing by the Local Planning Authority. The landscape management plan shall include a programme for implementation, long term design objectives, long term management responsibility and maintenance schedules for all landscaped areas. The development shall be carried out in accordance with the approved details.
REASON: In the interests of visual amenity of the area in accordance with Policy CH3 of the Crawley Borough Local Plan and the Manor Royal SPD.
16. The recommendations set out in the Ecological Impact Assessment report by Lizard Landscapes dated 11 June 2021 shall be implemented in full unless otherwise agreed in writing by the Local Planning Authority.
REASON: to ensure that the proposals avoid adverse impacts on protected and priority species and contribute to a net gain in biodiversity, in accordance with policy ENV2 of the Crawley Borough Local Plan 2015 - 2030.
17. Prior to the first occupation of the development, an enhancement and management plan for biodiversity features, which may be integrated with a landscape management plan, setting out aims, objectives initial enhancements, ongoing management operations, initial five-year action plan, details of responsibility for implementation, and, provision for review and updating shall be submitted to and approved by the Local Planning Authority. The approved details shall be implemented in full, including on site completion of initial biodiversity enhancements prior to first occupation, unless otherwise approved in writing by the Local Planning Authority.
REASON: To ensure that the proposals avoid adverse impacts on protected and priority species and contribute to a net gain in biodiversity, in accordance with policies ENV2 of the Crawley Borough Local Plan 2015-2030 and paragraph 175 of the NPPF.
18. Prior to the commencement of the development hereby permitted, details showing the proposed location of one fire hydrant or stored water supply (in accordance with the West Sussex Fire and Rescue Guidance Notes) shall be submitted to and approved in writing by the Local Planning Authority in consultation with West Sussex County Council's Fire and Rescue Service. The approved details shall then be implemented prior to occupation of the development.
REASON: to ensure the operational requirements of the development in accordance with Policy CH3 of the Crawley Borough Local Plan 2015 - 2030.
REASON FOR PRE-COMMENCEMENT: This condition is required pre-commencement as it relates to how the site layout and building will be constructed.
19. No above ground works shall be carried out unless and until a schedule of materials and finishes including samples of such materials and finishes to be used for external walls (and roofs) of the proposed building, including the glazing and cladding have been submitted to and approved by the Local Planning Authority. The development shall thereafter only be constructed in accordance with the approved materials.
REASON: To enable the Local Planning Authority to control the development in detail in the interests of amenity in accordance with Policy CH3 of the Crawley Borough Local Plan 2015-2030.
20. No above ground works shall be carried out unless and until precise details (including a 1:20 section of the glazing details), showing the ground and 1st floor window profiles, main entrance door fenestration profiles including surrounding details for the south and west elevations have been submitted to and been approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the agreed details.
REASON: To control the development in detail and to ensure a high quality development in accordance with policies CH2 and CH3 of the Crawley Borough Local Plan 2015-2030.

21. Prior to the commencement of the development hereby permitted, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:
- Management of any flat/shallow pitched roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds.
- The Bird Hazard Management Plan shall be implemented as approved, upon completion of the roof and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.
- Reason: It is necessary to manage the roof in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Gatwick Airport in accordance with Policy IN1 of the Crawley Borough Local Plan 2015 - 2030.
- REASON FOR PRE-COMMENCEMENT: This condition is required pre-commencement as it relates to how the building will be constructed.
22. Prior to the commencement of the development hereby permitted, a strategy to deal with the potential risks associated with any contamination of the site shall be submitted to, and approved in writing by, the Local Planning Authority. This strategy will include the following components:
1. A preliminary risk assessment which has identified:
 - all previous uses;
 - potential contaminants associated with those uses;
 - a conceptual model of the site indicating sources, pathways and receptors; and
 - potentially unacceptable risks arising from contamination at the site.
 2. A site investigation scheme, based on (1) to provide information for a detailed assessment of the risk to all receptors that may be affected, including those off site.
 3. The results of the site investigation and the detailed risk assessment referred to in (2) and, based on these, an options appraisal and remediation strategy giving full details of the remediation measures required and how they are to be undertaken.
 4. A verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy in (3) are complete and identifying any requirements for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action.
- Any changes to these components require the written consent of the local planning authority. The scheme shall be implemented as approved.
- REASON: The proposed site is on a former works/engineering/industrial ground with risk of contamination on the site and to ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution or contaminated land in accordance with Policy ENV10 of Crawley Borough Local Plan 2015-2030 and with paragraph 170 of the National Planning Policy Framework.
- REASON FOR PRE-COMMENCEMENT: This condition is required pre-commencement as it relates to how contamination will be investigated and remediated during construction and then during operation.
23. If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.
- REASON: To ensure that the development does not contribute to, or is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site in line with with Policy ENV10 of Crawley Borough Local Plan 2015-2030 paragraph 170 of the National Planning Policy Framework.
24. No solar panels shall be installed until full details have been submitted to and approved in writing by the Local Planning Authority. No subsequent alterations to the approved scheme are to take place unless agreed in writing by the Local Planning Authority. The scheme shall be implemented as approved.
- REASON: In the interest of visual amenity and to ensure the development does not endanger the safe movement of aircraft or the operation of Gatwick Airport through interference with communication, navigational aids and surveillance equipment and glare issues in accordance with Policies CH3 and ENV6 of the Crawley Borough Local Plan 2015-2030 and the Planning and Climate Change SPD

25. Within six months of the occupation of the development hereby permitted, a post-construction report shall be submitted to and agreed in writing by the Local Planning Authority, verifying that that Unit has achieved the minimum Energy and Water standards for BREEAM 'Excellent'.
REASON: In the interests of sustainable design and efficient use of water resources in accordance with Policies ENV6 and ENV9 of the Crawley Borough Local Plan 2015-2030 and the Planning and Climate Change Supplementary Planning Document.
26. The space and connection point for a future heat plate exchanger and associated future ducting route for a connection to a District Heat Network, identified on submitted drawing 6113-CBC-00-00-DR-U-96002 T01, shall be kept available for this purpose.
REASON: In the interests of environmental sustainability, in accordance with policy ENV7 of the Crawley Borough Local Plan 2015-2030 and the Planning and Climate Change Supplementary Planning Document.

INFORMATIVES(S)

1. Given the nature of the proposed development it is possible that a crane may be required during its construction. We would, therefore, draw the applicant's attention to the requirement within the British Standard Code of Practice for the safe use of Cranes, for crane operators to consult the aerodrome before erecting a crane in close proximity to an aerodrome. Gatwick Airport requires a minimum of four weeks' notice. For crane queries/applications please email: lgwcranes@gatwickairport.com

Please note that as from 31st May 2021 crane operators will in the first instance need to notify the Civil Aviation Authority (CAA) of any cranes in the UK that are over 10m in height or taller than the surrounding trees/structures. Notification should be at least 8 weeks before any crane is due on site. For further details please refer to CAP1096 'Guidance to Crane Operators on Aviation Lighting and Notification' available at www.caa.co.uk

2. Only clean uncontaminated water should drain to the surface water system. Roof drainage shall drain directly to the surface water system (entering after the pollution prevention measures). Appropriate pollution control methods (such as trapped gullies and interceptors) should be used for drainage from access roads and car parking areas to prevent hydrocarbons from entering the surface water system.
3. In regard to condition 22 above, the following applies:
1. A desk-top study carried out by a competent person. The study shall detail the history of the site uses and identify and evaluate all potential sources and impacts of land and/or groundwater contamination relevant to the site. Two full copies of the desk-top study and the non-technical summary shall be submitted to the LPA.
 2. A site investigation shall be carried out by a suitably qualified and accredited consultant/contractor in accordance with a Quality Assured sampling and analysis methodology BS 10175:2011. The site investigation should fully and effectively characterise the nature and extent of any land and/or groundwater contamination and its implications, including an assessment of risk to any potential receptors. A full report on the findings of the site investigation shall be submitted to the LPA see note above.
 3. A written remediation statement, detailing the works necessary so as to render harmless the identified contamination given the proposed end use of the site and surrounding environment, including any controlled waters, shall be submitted to the LPA and agreed in writing with the LPA prior to any remediation commencing on site. Two copies of the remediation report shall be submitted to the LPA.
 4. Approved remediation works shall be carried out in full on site, under a quality assured scheme to demonstrate compliance with the proposed methodology and best practice guidance. If during the remediation works contamination is encountered that had not previously been identified then the additional contamination shall be fully assessed and an appropriate remediation scheme agreed with the LPA in accordance with the process laid out at points 1 – 3 above.
 5. Upon completion of the remediation works, this condition shall not be discharged until further validation report has been submitted to, and approved by the LPA. The validation report shall include quality assurance certificates to show that the works have been carried out in accordance with the approved methodology. Details of any post remedial sampling and analysis to show the site has reached the required clean-up criteria shall be included in the

validation report together with the necessary documentation detailing what waste materials have been removed from the site.

4. The applicant is reminded that, under the Wildlife and Countryside Act 1981, as amended (Section 1), it is an offence to remove, damage or destroy the nest of any wild bird while that nest is in use or is being built. Planning consent for a development does not provide a defence against prosecution under this Act.

Trees and scrub are likely to contain nesting birds between 1 March and 31 August inclusive. Trees and scrub are present on the application site and are assumed to contain nesting birds between the above dates, unless a recent survey has been undertaken by a competent ecologist to assess the nesting bird activity during this period and shown it is absolutely certain that nesting birds are not present.

5. The applicant is advised of the following advice from Thames Water:
There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planningyour-development/Working-near-or-diverting-our-pipes>.
6. The applicant is advised of the following advice from Southern Water:
 - No excavation, mounding or tree planting should be carried out within 6 metres of the public water main without consent from Southern Water.
 - No new soakaways should be located within 5 metres of a public water main.
 - All existing infrastructure, including protective coatings and cathodic protection, should be protected during the course of construction works. Please refer to: southernwater.co.uk/media/default/PDFs/stand-off-distances.pdf

Following initial investigations, Southern Water can provide a water supply to the site. Southern Water requires a formal application for connection and on-site mains to be made by the developer. A formal application for a connection can be made via Southern Water's online developer services portal at: <https://developerservices.southernwater.co.uk>

1. NPPF Statement

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

- Liaising with consultees/respondents/applicant/agent and discussing the proposal where considered appropriate and necessary in a timely manner during the course of the determination of the application.
- Seeking amended plans/additional information to address identified issues during the course of the application.

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.



CR/2021/0247/FUL Proposed Site Plan 4

