



# Gatwick Airport Northern Runway Project

Planning Statement Appendix E – Local Policy Compliance Tables

**Book 7**

VERSION: 1.0

DATE: APRIL 2024

Application Document Ref: 7.1

PINS Reference Number: TR020005

## Local Planning Policy Compliance Tables

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## Annex A: Local Planning Compliance Table – Crawley Borough Council

## 1 Local Planning Policy Compliance Tables – Annex A – Crawley Borough Council

### 1.1. Introduction

1.1.1 This document comprising a Local Planning Policy Compliance Table in respect of Crawley Borough Council's (CBC) Development Plan, setting out local planning policies that are of relevance to the Northern Runway Project (NRP) and the extent to which the NRP complies with those policies.

1.1.2 As made clear in the **Planning Statement** [[APP-245](#)], national policy provides the primary planning policy frameworks for the consideration and determination of the Project. However local planning policy can also be important and relevant. Where any conflicts arise between local and national policy, national planning policy would prevail. **Appendix C** [[APP-248](#)] of the Planning Statement contains the Planning Policy Compliance Tables which identify and respond to national planning policy.

1.1.3 This document:

- identifies CBC's local policies which may be relevant to the consideration of the Project, including any specific local policies related to Gatwick Airport; and
- provides a summary of the Project's compliance with CBC's policies, including cross references to key documents forming part of the DCO application where additional detailed information can be found.

1.1.4 This document has also been prepared taking account of the **Joint West Sussex Local Impact Report** [[REP1-068](#)] prepared by CBC, together with West Sussex County Council, Horsham District Council and Mid Sussex District Council, in that this document identifies and responds to local policies referenced in the **Joint West Sussex LIR**.

1.1.5 In line with the **Joint West Sussex LIR** [[REP1-068](#)], the policy documents considered by this document comprise:

### Adopted Development Plan documents

- Crawley Borough Council Local Plan 2015 – 2030 (adopted December 2015)
- Development at Gatwick Airport Supplementary Planning Document (adopted November 2008)<sup>1</sup>

### Emerging Development Plan documents

- Draft Crawley Borough Local Plan 2023 – 2040 (Modification Consultation version, 12 February – 25 March 2024)

1.1.6 The planning policy designations that apply to land within the Project's Order Limits that fall within CBC administrative boundary are identified on the **Planning Policy Plan** contained in **Planning Statement Appendix B** (Doc Ref. 7.1).

1.1.7 The majority of the works proposed by the Project are located with CBC administrative area, as relating to the existing airport. The Project proposed works associated to the surface access and active travel improvements at Longbridge Roundabout, the Longbridge Roundabout and Car Park B North replacement open space areas and the parts of the highway improvements along the A23 / M23 are located outside of CBC's jurisdiction. In accordance with CBC's adopted Local Plan map<sup>2</sup>:

- The boundary of Gatwick Airport is identified and outside of this, land is safeguarded to the east, south and west of the airport;
- Outside the airport boundary are Biodiversity Opportunity Areas to the east and south (some areas within the Project boundary);
- Two designated long distance cross the airport;
- Statutory listed buildings and locally listed buildings are located within and surrounding the airport.

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<sup>1</sup> No reference is made to the Development at Gatwick Airport SPD in the **Joint West Sussex Local Impact Report** [REP1-068] as being relevant to the Project and it is therefore not included in this document.

<sup>2</sup> <http://crawley.maps.arcgis.com/apps/Viewer/index.html?appid=340b4726a9e3456998fe6d5738e5c76d>

1.1.8 Other points to note:

- Page 68 of the **Joint West Sussex Local Impact Report** [[REP1-068](#)] makes reference to Policy CH8 of the draft Local Plan as relevant to landscape, townscape and visual resources. The Applicant has not been able to identify this policy and therefore it is excluded from this document.

<b>Crawley 2030: Crawley Borough Council Local Plan 2015 – 2030</b>		
<b>Policy Reference</b>	<b>Policy Description</b>	<b>Compliance Commentary</b>
<b>Sustainable Development</b>		
<p><b>Policy SD1:</b> Presumption in favor of sustainable development</p>	<p>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.</p> <p>The council will work proactively in partnership with applicants, stakeholders and other partners to jointly find solutions which mean that development can be approved wherever possible, whilst securing development that improves the economic, social and environmental conditions of Crawley and the wider Gatwick Diamond sub region.</p> <p>Development will be supported where it meets the following strategic objectives:</p> <ol style="list-style-type: none"> <li>1. Progress towards Crawley’s commitment to being carbon neutral by 2050 and adapts to climate change;</li> <li>2. Complements Crawley’s character as a compact town within a countryside setting, developed on a neighbourhood principle and maximises the use of sustainable travel;</li> </ol>	<p>Policy SD1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 15.15, 18.15 and 24.25 and page 132) as forming part of the policy context for the Project.</p> <p>In accordance with Policy SD1, matters relating to sustainable development are considered in the <b>Planning Statement</b> <a href="#">[APP-245]</a> and the <b>Sustainability Statement</b> forming <b>Appendix D</b> of the <b>Planning Statement</b> (Doc Ref. 7.1). The Planning Statement and Sustainability Statement is informed by the Environmental Statement, which addresses 13 separate environmental topics in addition to the in-combination and cumulative effects of the Project.</p> <p>Section 9 of the <b>Planning Statement</b> concludes in identifying that the Project is</p>

	<ol style="list-style-type: none"> <li>3. Respects the heritage of the borough;</li> <li>4. Protects, enhances and creates opportunities for Crawley’s unique Green Infrastructure;</li> <li>5. Provides a safe and secure environment for its residents and visitors;</li> <li>6. Provides for the social and economic needs of Crawley’s current and future population; and</li> <li>7. Accords with the policies and objectives set out in this Plan unless material considerations indicate otherwise.</li> </ol>	<p>a sustainable development and would generate substantial benefits that outweigh the adverse impacts that have been identified.</p> <p>As such, the Project meets the strategic objectives of Policy SD1.</p>
<b>Character</b>		
<p><b>Policy CH2: Principles of Good Urban Design</b></p>	<p>To assist in the creation, retention or enhancement of successful places in Crawley, development proposals will be required to:</p> <ol style="list-style-type: none"> <li>a) respond to and reinforce locally distinctive patterns of development and landscape character and protect and/or enhance heritage assets;</li> <li>b) create continuous frontages onto streets and spaces enclosed by development which clearly defines private and public areas;</li> <li>c) create public spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people;</li> </ol>	<p>Policy CH2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 24.19 and page 418) as forming part of the policy context for the Project.</p> <p>Matters relating to compliance of the Project with the principles of good urban design are fully considered within <b>Section 7.6 of the Planning Statement</b> <a href="#">[APP-245]</a> and the <b>Design and Access Statement</b> <a href="#">[REP2-032 to REP2-036]</a> wherein it is demonstrated that the Project utilises principles of good urban design. The importance of good design is also</p>



	<p>d) make places that connect with each other and are easy to move through, putting people before traffic and integrating land uses and transport networks;</p> <p>e) provide recognisable routes, intersections and landmarks to help people find their way around;</p> <p>f) consider flexible development forms that can respond to changing social, technological and economic conditions; and</p> <p>g) provide diversity and choice through a mix of compatible developments and uses that work together to create viable places that respond to local needs.</p> <p>Applications must include information that demonstrates that these principles would be achieved, or not compromised, through the proposed development.</p>	<p>acknowledged in <b>Section 7</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a></p> <p>The design of the Project has full regard to the local landscape character and has been assessed in accordance with the requirements of Policies CH2 and CH3 by <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> and <b>Section 8.15</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. As such, the Project complies with Policy CH2.</p>
<p><b>Policy CH3: Normal Requirements of All New Development</b></p>	<p>All proposals for development in Crawley will be required to:</p> <p>a) Be based on a thorough understanding of the significance and distinctiveness of the site and its immediate and wider context and demonstrate how attractive or important features which make a positive contribution to the area would be integrated, protected and enhanced. These features include: views, landmarks, footpaths, rights of way, trees, green spaces, hedges, other historic landscape</p>	<p>Policy CH3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 8.21, 9.30 and 24.20 and page 68) as forming part of the policy context for the Project.</p> <p>The importance of good design is acknowledged in <b>Section 7</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and the design of the Project, including its evolution, is set out and justified in full in</p>

	<p>features or nature conservation assets, walls and buildings;</p> <p>b) 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. Proposals must be supported by a future management and maintenance plan for all shared hard and soft landscaping, semi-public or semi private areas to ensure these areas become well-established. Contributions towards streetscape improvements, public art and CCTV will be sought in accordance with council guidance;</p> <p>c) Provide or retain a good standard of amenity for all existing and future occupants of land and buildings, including compliance with internal standards for new dwellings as set out in Policy CH5, and not cause unreasonable harm to the amenity of the surrounding area by way of overlooking, dominance or overshadowing, traffic generation and general activity, for example noise, smells and/or vibration;</p> <p>d) Retain existing individual or groups of trees that contribute positively to the area and allow sufficient space for trees to reach maturity. Sufficient space should also be provided in private gardens that would not be overshadowed by tree canopies; and proposals should ensure that rooms within buildings</p>	<p>the <b>Design and Access Statement</b> [REP2-032 to REP2-036]. The <b>DAS</b> and the <b>ES</b> set out the detailed analysis and understanding of the existing site and its surroundings in accordance with part (a), which has informed the design and assessment work.</p> <p>The design of the Project has full regard to the local landscape character and has been assessed in accordance with the requirements of Policies CH2 and CH3 by <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033], <b>Section 8.15 of the Planning Statement</b> [APP-245] and the <b>Design and Access Statement</b> [REP2-032 to REP2-036].</p> <p>The application is also accompanied by a series of design principles, set out in the <b>Design and Access Statement Appendix 1</b> (Doc Ref. 7.3), which the detailed design is required to be in accordance with to deliver a high quality design in accordance with Policy CH3. This includes a project-wide design principle to maintain important trees and</p>
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	<p>would receive adequate daylight. Where a development is proposed or where trees would be lost to development, tree planting should accord with the standards set out in Policy CH6;</p> <p>e) Demonstrate how “Secure by Design” principles and guidance set out in “Secured by Design” design guide (as amended) have been incorporated into development proposals to reduce crime, the fear of crime, anti-social behaviour and disorder. For all development, the potential impact on community safety must be carefully considered at the earliest opportunity to ensure that measures are integrated into proposals without compromising other objectives;</p> <p>f) Meet the requirements necessary for their safe and proper use, in particular with regard to access, circulation and manoeuvring, vehicle and cycle parking, loading and unloading, and the storage and collection of waste/recycling; and</p> <p>g) In respect of residential schemes, demonstrate how the Building for Life 12 criteria (as amended) for the evaluation of the design quality of residential proposals have been taken into account and would be delivered through the scheme.</p> <p>Development proposals should comply with any relevant supplementary planning guidance produced by the council</p>	<p>vegetation where feasible to do so against the design requirements in line with part (d).</p> <p>In addition, the application is accompanied by an <b>Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a> to <a href="#">[APP-116]</a> which sets out the objectives to deliver and manage landscape and ecology features across the Project, which will be developed through detailed Landscape and Ecology Management Plan for approval in line with Requirement 8 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p> <p>The Project therefore complies with Policy CH3 where relevant to the Project proposals.</p>
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	<p>including residential extensions, Conservation Area Appraisals, the Manor Royal SPD, and advice on signs and advertisements. Further information on specific requirements for development can be found in the Local List of Planning Requirements.</p>													
<p><b>Policy CH6: Tree Planting and Replacement Standards</b></p>	<p>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.</p> <p>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. Proposals must demonstrate that the number of replacements accords with the following requirements:</p> <table border="1" data-bbox="465 1034 1323 1425"> <thead> <tr> <th>Trunk diameter of each tree (measured in cms at 1.5m above ground level) to be removed</th> <th>No. of replacement trees required:</th> </tr> </thead> <tbody> <tr> <td>Less than 19.9</td> <td>1</td> </tr> <tr> <td>20 – 29.9</td> <td>2</td> </tr> <tr> <td>30 – 39.9</td> <td>3</td> </tr> <tr> <td>40 – 49.9</td> <td>4</td> </tr> <tr> <td>50 – 59.9</td> <td>5</td> </tr> </tbody> </table>	Trunk diameter of each tree (measured in cms at 1.5m above ground level) to be removed	No. of replacement trees required:	Less than 19.9	1	20 – 29.9	2	30 – 39.9	3	40 – 49.9	4	50 – 59.9	5	<p>Policy CH6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 8.21, 9.31 and 24.25 and pages 68 and 99 to 101) as forming part of the policy context for the Project.</p> <p><b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> (Doc Ref. 5.3) sets out the tree survey information and assessment of their quality, in line with British Standards. The AIA provides an assessment of the proposed tree removals and re-planting or new planting based on the preliminary design work. The AIA also provides an assessment of the replanting requirements against CBC’s Local Plan Policy CH6 assessment requirements and informed by the Tree Survey Report.</p>
Trunk diameter of each tree (measured in cms at 1.5m above ground level) to be removed	No. of replacement trees required:													
Less than 19.9	1													
20 – 29.9	2													
30 – 39.9	3													
40 – 49.9	4													
50 – 59.9	5													

	<table border="1" data-bbox="465 264 1323 400"> <tr> <td>60 – 69.9</td> <td>6</td> </tr> <tr> <td>70 – 79.9</td> <td>7</td> </tr> <tr> <td>80+</td> <td>8</td> </tr> </table> <p>The girth of replacement trees will vary depending on species and location but should balance the need to reduce the likelihood of new tree stock failing to survive whilst providing visual amenity from the outset.</p> <p>The additional and replacement tree planting requirements would normally be expected to be met within the development site. Where the local planning authority agrees that this is not feasible or desirable, commuted sums will be sought in lieu on a per tree basis, taking account of constraints to planting. The approach would enable the green character and appearance of the borough to be maintained through tree planting on appropriate and available land.</p> <p>The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal.</p>	60 – 69.9	6	70 – 79.9	7	80+	8	<p>This demonstrates that, based on the current preliminary designs, the Project would meet the requirements for replanted trees under Policy CH6.</p>
60 – 69.9	6							
70 – 79.9	7							
80+	8							
<p><b>Policy CH8: Important Views</b></p>	<p>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.</p>	<p>Policy CH8 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 8.18 and 24.25) as forming part of the policy context for the Project.</p>						

	<p><u>Linear contained views</u></p> <p>The robust tree planting that contains the views is essential to their quality and must be protected and/or enhanced. All new buildings, structures, signs and advertisements, parked vehicles and hard surfaced areas must therefore be well screened by trees and other soft landscaping. Development proposals at the end of the view corridor must demonstrate that the view would be protected and/or enhanced.</p> <p>The Boulevard view lies between the Morrisons supermarket and the Central Sussex College Tower. Any proposals in the area will be required to retain, or enhance, the vista or to replace it with public realm of equal, or greater, townscape value.</p> <p><u>Long distance views</u></p> <p>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. The visual impact of proposals affecting Important Views must be clearly and accurately demonstrated as part of the planning application submission, for example through the use of verified view montages and cross sections.</p>	<p>Policy CH8 and the designated ‘Long Distance Views’ identified on CBC’s Policy Map, being from Target Hill and Tilgate Park, are considered within <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>], namely within <b>Section 8.6</b> and in the viewpoint photography in the <b>ES Landscape, Townscape and Visual Resources Figures</b> [APP-060 to APP-062]. The Project would not result in an obstruction in the foreground of the designated long distance views as prohibited by Policy CH8.</p> <p>As explained in <b>Table 8.3.1</b> of <b>ES Chapter 8</b>, Target Hill ‘Long Distance View’ was scoped out of the assessment as there is no intervisibility with Gatwick Airport. Tilgate Park ‘Long Distance View’ is assessed in <b>ES Chapter 8</b> and shown on <b>ES Figure 8.4.21</b>. As set out in Section 8.9 of <b>ES Chapter 8</b>, the assessment identifies that the impact of the Project on the Target Hill viewpoint, together with other mid to long distance views, would result in no more than a negligible adverse</p>
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		<p>effect during the construction period, which is not significant. During operation, the effect would be negligible to minor adverse effects in the long term during the day and at night, would not be significant.</p> <p>The assessment has been carried out in line with Policy CH8 and demonstrates that the Project would not harm the designated long distance views.</p>
<p><b>Policy CH9: Development Outside the Built- Up Area</b></p>	<p>To ensure that Crawley’s compact nature and attractive setting is maintained, development should:</p> <ul style="list-style-type: none"> <li>i. Be grouped where possible with existing buildings to minimise impact on visual amenity;</li> <li>ii. Be located to avoid the loss of important on-site views and off-site views towards important landscape features;</li> <li>iii. Reflect local character and distinctiveness in terms of form, height, scale, plot shape and size, elevations, roofline and pitch, overall colour, texture and boundary treatment (walls, hedges, fences and gates);</li> <li>iv. Minimise the impact of lighting to avoid blurring the distinction between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky;</li> </ul>	<p>Policy CH9 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 8.19 and 24.25 and page 67 to 69) as forming part of the policy context for the Project.</p> <p>The Project is located outside the built-up area boundary defined on the CBC Local Plan Map. However, excluding the proposed surface access works and environmental mitigation areas, the Project’s Order Limits are within the Gatwick Airport Boundary defined on CBC’s Local Plan Map. As such, the specific Gatwick Airport policies within the CBC Local Plan are considered of</p>

	<ul style="list-style-type: none"> <li>v. Ensure the building and any outdoor storage and parking areas are not visually prominent in the landscape;</li> <li>vi. Does not generate an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;</li> <li>vii. Does not generate traffic of a type or amount inappropriate to the rural roads; and</li> <li>viii. Does not introduce a use which by virtue of its operation is not compatible with the countryside.</li> </ul> <p>Where harm to the landscape character cannot be avoided appropriate mitigation and, as a last resort, compensation, will be required as part of a planning application. Applicants are advised to consider the enhancement opportunities identified in the Crawley Borough Council Landscape Character Assessment.</p> <p>In addition to the above, all proposals must recognise the individual character and distinctiveness, and the role of the landscape character area or edge in which it is proposed as shown on the Local Plan Map, established by the Crawley Borough Council Landscape Character Assessment and set out below:</p> <p><u>North East Crawley High Woodland Fringes</u></p>	<p>relevance to the Project and not policies controlling development outside the built-up area boundary (e.g. Policies CH9 and EC9).</p> <p>Notwithstanding this, the assessment of the Project upon visual amenity and landscape character are considered within <b>Section 7.7</b> and <b>8.15</b> of the <b>Planning Statement</b> [APP-245], <b>Section 8.15</b> of the <b>Planning Statement</b> [APP-245] and the <b>Design and Access Statement</b> [REP2-032 to REP2-036]. The submissions conclude that the Project will result in an acceptable visual impact on the rural setting of Crawley and would therefore not conflict with Policy CH9.</p>
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	<p>Proposals which do not create or are able to adequately mitigate visual/noise intrusion are generally supported. This area has an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley.</p> <p><u>Upper Mole Farmlands Rural Fringe</u> Proposals which do not create or are able to adequately mitigate visual/noise intrusion are generally supported. This area has an important role in maintaining the separation of the distinct identity of Gatwick Airport from Crawley and the valuable recreational links from the northern neighbourhoods of Crawley into the countryside.</p> <p>B Use Class development may be suitable within this area where it constitutes a comprehensively planned extension abutting Manor Royal (Policy EC3) and meets criteria i-vii of this policy in its relationship with the surrounding countryside.</p> <p><u>West of Ifield Rural Fringe</u> Proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.</p> <p><u>West of Gossops Green/Bewbush Rural Fringe</u></p>	
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The green infrastructure along Bewbush Brook and Spruce Hill Brook is of high value and should be protected and linked to green infrastructure in the new neighbourhood, Kilnwood Vale and where other opportunities arise.

South of Broadfield into Buchan Hill Forest and Fringes

The green fingers and local nature reserve will be conserved as they provide existing green infrastructure links with potential for improvement to accessing the countryside and wildlife corridors. The area is valued for its quiet recreational opportunities which should be maintained. Proposals should not conflict with the High Weald AONB Management Plan objectives.

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.

Certain types of development may alter one or more important elements that make up a Character Area or Edge. This is acceptable if its overall character and role is not compromised, and measures are taken to limit impacts through mitigation and enhancement where possible. This may be the strengthening of other elements of the area's character or general enhancement through increased

	<p>biodiversity, green links and other mitigation measures as detailed in the Landscape Character Assessment.</p> <p>Proposals which alter the overall character of the area must demonstrate that the need for the development clearly outweighs the impact on landscape character and is in accordance with national and local policy. Mitigation and/or compensation will be sought in such cases where this can be proven.</p>	
<p><b>Policy CH10: High Weald Area of Outstanding Natural Beauty</b></p>	<p>The council will conserve and enhance the natural beauty and setting of the High Weald AONB by having particular regard to the High Weald AONB Management Plan in determining development proposals affecting the AONB.</p>	<p>Policy CH10 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 8.21) as forming part of the policy context for the Project.</p> <p>Consistent with the objective of Policy CH10, the Project has been assessed in terms of its potential effects upon AONBs. The assessment is set out within <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a> and <b>Section 8.15</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. <b>ES Chapter 8</b> has also taken account of the respective AONB Management Plans, as detailed in Section 8.6.</p>

		<p>The Project has also been assessed in terms of its potential effects upon AONBs including an assessment of effects on the perception of tranquillity within nationally designated landscapes. The assessment is set out within <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> [<a href="#">APP-033</a>] and <b>Section 8.15 of the Planning Statement</b> [<a href="#">APP-245</a>]. The assessment concludes that an increase of up to 20% in overflights compared to the future baseline in 2032 would result in minor adverse effects on perception of tranquillity, which is not significant. The Project will therefore not materially affect the positive qualities visitors and nearby residents expect of the AONBs (such as High Weald AONB) including distant scenic views and the landscape’s relative tranquillity and dark skies. The Project therefore does not conflict with Policy CH10.</p>
<b>Policy CH11: Rights of Way and Access to the Countryside</b>	<p>Unless it can be clearly shown that a Public Right of Way is unnecessary or not needed, proposals which result in the loss of a public right of way must ensure reprovion of equal or better value.</p>	<p>Policy CH11 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (paras 8.21 and 11.12 and pages 68 and</p>

	<p>Proposals which detract from the character of a right of way or other type of recreational route must adequately mitigate the impacts or provide a new resource of equal or better value if this is not possible.</p> <p>This may include:</p> <ul style="list-style-type: none"> <li>i) the provision of safe and convenient links to nearby rights of way/recreational routes; and/or</li> <li>ii) new or upgraded existing rights of way to multi-functional routes to create benefits for a range of users.</li> </ul>	<p>132 to 133) as forming part of the policy context for the Project.</p> <p>Rights of way and access to the countryside are assessed in <b>Section 8.10 of the Planning Statement [APP-245]</b>, <b>Section 19.9 of ES Chapter 19: Agriculture and Recreation [APP-044]</b>, <b>ES Appendix 19.8.1: Outline Public Rights of Way Management Strategy [APP-215]</b> and in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-208]</b>.</p> <p>The assessment demonstrates the Project complies with Policy CH11 and will result in new public rights of way and improvements to existing public rights of way.</p>
<p><b>Policy CH12: Heritage Assets</b></p>	<p>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.</p> <p>Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be</p>	<p>Policy CH12 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 7.13 and pages 52 to 53) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 7: Historic Environment [APP-032]</b> and <b>Section 8.14</b> of the</p>

	<p>required. This should describe the significance of any heritage assets affected and the contribution made by their setting, the impact of the development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated.</p> <p>If, in exceptional circumstances, a heritage asset is considered to be suitable for loss or replacement, and it has been demonstrated its site is essential to the development's success, proposals will need to demonstrate how they have recorded the heritage asset:</p> <ul style="list-style-type: none"> <li>i. in line with a written scheme of investigation submitted to, and approved by, Crawley Borough Council; or</li> <li>ii. in the case of standing structures, to a minimum of Historic England recording Level 2, or higher if specified by the council.</li> </ul> <p>Applicants are also required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record (HER).</p> <p>Applicants should demonstrate that the benefits of the entire scheme outweigh the loss of the asset and that any</p>	<p><b>Planning Statement</b> <a href="#">[APP-245]</a> consider the historic environment in relation to the Project. A full archaeological assessment is made as part of this and is formed of <b>ES Appendix 7.6.2: Archaeological Evaluation Report</b> <a href="#">[APP-102]</a>, <b>ES Appendix 7.6.3: Archaeological Evaluation Report Phase 2 - Longbridge Roundabout and Reigate Field</b> <a href="#">[APP-103]</a> and <b>ES Appendix 7.6.4: Geotechnical Data Review</b> <a href="#">[APP-104]</a>.</p> <p>Subject to appropriate mitigation, as secured through <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>, <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, <a href="#">[APP-114]</a>, <a href="#">[APP-115]</a>, <a href="#">[APP-116]</a> <b>ES Appendix 7.8.1: Written Scheme of Investigation for post-consent Archaeological Investigations – Surrey</b> <a href="#">[APP-105]</a> and <b>ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording – West Sussex</b> <a href="#">[APP-106]</a>, the proposal will not have any unduly harmful</p>
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	replacement scheme is of equal quality in terms of its design.	effects on Crawley’s heritage assets and therefore is complaint with Policy CH12
<b>Economic Growth</b>		
<b>Policy EC1: Sustainable Economic Growth</b>	<p>Crawley’s role as the key economic driver for the Gatwick Diamond will be protected and enhanced. The council will ensure that all suitable opportunities within the borough are fully explored to enable existing and new businesses to grow and prosper.</p> <p>To ensure that Crawley’s recognised economic role and function is maintained and enhanced the council will:</p> <ul style="list-style-type: none"> <li>i) Build upon and protect the established role of Manor Royal as the key business location (B Use Classes) for Crawley at the heart of the Gatwick Diamond; and</li> <li>ii) Ensure that the town’s Main Employment Areas are the focus for sustainable economic growth.</li> </ul> <p>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.</p>	<p>Policy EC1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 335) as forming part of the policy context for the Project.</p> <p>The Project is anticipated to bring about significant benefits to the local economy, in line with the aspirations of Policy EC1. Further detail on this is set out in the Application, most notably <b>Sections 3 and 8.3 of the Planning Statement</b> <a href="#">[APP-245]</a>, <b>ES Chapter 17: Socio-Economics</b> <a href="#">[APP-042]</a>, <b>ES Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a> and the <b>Needs Case</b> <a href="#">[APP-250]</a>.</p> <p><b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> <a href="#">[APP-198]</a> sets out the Project’s measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and which will ensure that</p>

	<p>To achieve this, minor extensions in proximity to Manor Royal may be appropriate, but it is recognised that the majority of land required will necessitate the identification of new strategic employment location(s) within the Plan period. Any strategic employment location(s) will be of a scale and function that helps meet identified quantitative and qualitative needs for business development and will complement the established role of Manor Royal as a strong and competitive business district.</p> <p>The preferred location for strategic employment is within the borough, to the north of Manor Royal and south or east of Gatwick Airport, identified as the Area of Search on the Key Diagram. However, given current safeguarding of this land for a possible second runway at Gatwick, work required to identify an appropriate site, or sites, for further business development will take place after the government has issued a final decision on additional runway capacity in the UK, and has determined whether the area should still remain safeguarded.</p>	<p>the local area benefits from new employment opportunities, in line with Policy EC1’s objective.</p>
<p><b>Policy EC2: Economics Growth in Main Employment Areas</b></p>	<p>As a key economic driver in the sub-region, Crawley’s main employment areas make a significant contribution to the economy of the town and the wider area. Therefore, Main Employment Areas are identified as a focus for sustainable economic growth, each of which has a different character and function.</p>	<p>Policy EC2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 335) as forming part of the policy context for the Project.</p>



	<p>Whilst identified as Main Employment Areas, Manor Royal, Gatwick Airport and the Town Centre perform a specific employment role which is recognised in individual location-specific Policies EC3, EC5 – 7, and GAT1 – 4.</p> <p>The other Main Employment Areas are:</p> <ul style="list-style-type: none"> <li>• Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue)</li> <li>• Maidenbower Business Park</li> <li>• Tilgate Forest Business Centre • Broadfield Business Park</li> <li>• Lowfield Heath</li> <li>• Broadfield Stadium and K2 Crawley</li> <li>• The Hawth.</li> </ul> <p>Proposals for employment generating development at the seven locations above will be supported where they contribute to the specific characteristics of the main employment area, and overall economic function of the town, through providing a mix of employment generating uses.</p> <p>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</p>	<p>The Project does not result in the net loss of employment floorspace at Gatwick Airport, defined by the ‘Gatwick Airport Boundary’ on the CBC Policy Map. As such, the Project does not conflict with Policy EC2.</p>
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	<p>be permitted where they are able to demonstrate that:</p> <ul style="list-style-type: none"> <li>i. the site is no longer suitable, viable or appropriate for employment purposes; and</li> <li>ii. the loss of any floorspace will result in a wider social, environmental or economic benefit to the town; and</li> <li>iii. there is no adverse impact on the economic role or function of the Main Employment Area, and wider economic function of Crawley.</li> </ul>	
<p><b>Policy EC3: Manor Royal</b></p>	<p>Manor Royal is the principal business location for Crawley, and instrumental to the success of the wider Gatwick Diamond.</p> <p>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.</p> <p>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.</p> <p>All development at Manor Royal should contribute positively</p>	<p>Policy EC3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 335) as forming part of the policy context for the Project.</p> <p>The Project does not propose works within the designated Manor Royal business location. As such, Policy EC3 is not relevant to the Project.</p>

	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.	
<b>Policy EC4: Employment Development and Residential Amenity</b>	<p>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.</p> <p>Proposals for the development, redevelopment or change of use of sites for employment use adjacent to residential areas will be permitted where there is no adverse harm to local amenity or function of the surrounding area.</p> <p>Particular care should be taken within the Manor Royal Buffer Zones, where business and business-supporting uses will be permitted provided that proposals do not adversely impact upon the amenity, function and setting of nearby residential uses.</p>	<p>Policy EC4 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy context for the Project.</p> <p>The Project does not propose residential development within or adjacent to Main Employment Areas as designated on CBC's Local Plan map. As such, Policy EC4 is not relevant to the Project.</p>
<b>Housing</b>		
<b>Policy H1: Housing Provision</b>	The council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever	Policy H1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 332) as forming part of the policy context for the Project.

	<p>possible, whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.</p> <p>All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.</p> <p>The Local Plan makes provision for the development of a minimum of 5,100 net dwellings in the borough in the period 2015 to 2030.</p> <p>There will be a remaining unmet housing need, of approximately 5,000 dwellings, arising from Crawley over the Plan period. The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of potential urban extensions to Crawley.</p>	<p>However, the Project does not propose new housing development within CBC's jurisdiction. As such, Policy H1 is not of relevant to the Project.</p>
<p><b>Policy H3: Future Housing Mix</b></p>	<p>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</p>	<p>Policy H3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy</p>

	<p>and sizes for each site will depend upon the size and characteristics of the site and the viability of the scheme. However, consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley.</p> <p><u>Affordable Housing</u> In delivering the affordable housing element of residential schemes, in line with Policy H4, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council’s Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need.</p>	<p>context for the Project. However, the Project does not propose new housing development within CBC’s jurisdiction. As such, Policy H3 is not relevant to the Project.</p>
<p><b>Policy H4: Affordable and Low Cost Housing</b></p>	<p><u>Affordable Housing</u> 40% affordable housing will be required from all residential developments.</p> <p>The council will expect a minimum of 70% of the affordable housing to be Affordable Rent, or Social Rent where other forms of subsidy exist, and up to 30% Intermediate tenure.</p> <p>For sites of 5 dwellings or less, or less than 0.2ha in size, a commuted sum towards off-site affordable housing provision will be sought.</p>	<p>Policy H4 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy context for the Project. However, the Project does not propose new housing development within CBC’s jurisdiction. As such, Policy H4 is not of relevant to the Project.</p>

	<p><u>Low Cost Housing</u> 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.</p> <p><u>Exceptions</u> These targets will apply to all residential developments unless evidence can be provided to show that the site cannot support these requirements from a viability perspective and that the development clearly meets a demonstrable need.</p> <p>Where viability is a concern, the council’s order of cascading priority will be to firstly lower the expectations for low cost housing; then, through a more comprehensive viability assessment, to consider adjusting the tenure mix of affordable housing to assist the viability; and, finally, to consider adjusting the percentage of affordable housing to a negotiated level that the scheme can support.</p> <p>Except for sites of 5 dwellings or less, payments in lieu will only be accepted in exceptional circumstances where it can be demonstrated that there are robust planning reasons for doing so and provided that the contribution is of equivalent financial value.</p>	
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<p>Policy H6: Houses in Multiple Occupation</p>	<p>Proposals for the development and change of use of an existing property to a House in Multiple Occupation will normally be permitted provided that:</p> <ul style="list-style-type: none"> <li>i) The location, design and layout of the development is appropriate for the proposed occupiers;</li> <li>ii) The proposal, by virtue of its intensity of occupation and activity or due to its cumulative impact in the area, would have no adverse impact upon the character of the area and the amenity and privacy of neighbouring properties;</li> <li>iii) iii) Development can meet its operational needs (e.g. parking, servicing) including Crawley Borough Council's adopted HMO Standards.</li> </ul>	<p>Policy H6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy context for the Project. However, the Project does not propose new housing development within CBC's jurisdiction. As such, Policy H6 is not of relevant to the Project.</p>
<b>Environment</b>		
<p>Policy ENV1: Green Infrastructure</p>	<p>Crawley's multi-functional green infrastructure network will be conserved and enhanced through the following measures:</p> <ul style="list-style-type: none"> <li>i. Development which protects and enhances green infrastructure will be supported;</li> <li>ii. Development proposals should take a positive approach to designing green infrastructure, utilising the council's supplementary planning documents to</li> </ul>	<p>Policy ENV1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 9.29, 11.12 and 24.25 and pages 99 to 100) as forming part of the policy context for the Project.</p> <p>The Project's considerations for green infrastructure provisions are embedded within the Project and are assessed within <b>ES Chapter 8: Landscape, Townscape</b></p>

	<p>integrate and enhance the green infrastructure network;</p> <p>iii. Proposals which reduce, block or harm the functions of green infrastructure will be required to be adequately justified, and mitigate against any loss or impact or as a last resort compensate to ensure the integrity of the green infrastructure network is maintained;</p> <p>iv. The strategic green infrastructure network is afforded the highest protection due to its high value from existing or identified potential multiple functions, for example as recreation, routeways, access to the countryside, wildlife and climate mitigation;</p> <p>v. Proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond;</p> <p>vi. Large proposals will be required to provide new and/or create links to green infrastructure where possible.</p>	<p><b>and Visual Resources</b> <a href="#">[APP-033]</a>, <b>Section 8.15 of the Planning Statement</b> <a href="#">[APP-245]</a> and <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (oLEMP)</b> (Doc Ref. 5.3). The oLEMP takes a positive approach to developing an overarching landscape strategy and accompanying landscape principles specific to each zone or particular development feature, to inform the detailed Landscape and Ecology Management Plans.</p> <p>A number of the design principles, forming part of the <b>Design and Access Statement (Appendix 1)</b> (Doc Ref. 7.3) and secured under the <b>Draft DCO</b> <a href="#">[REP1-004]</a>, are focused on delivering new soft landscaping measures that deliver a high quality environment within Gatwick Airport and its surrounding landscape and townscape.</p> <p>Through these documents, which the future detailed design must be in accordance with under the <b>Draft DCO</b></p>
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		<p><a href="#">[REP1-004]</a>, the Project aligns with the objectives of Policy ENV1.</p> <p>A series of new replacement open space and environmental mitigation measures are proposed as part of the Project, providing new opportunities for walking and cycling in line with part (v) of Policy ENV1.</p>
<p><b>Policy ENV2: Biodiversity</b></p>	<p>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.</p> <p>Habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value based on past ecological surveys.</p> <p><u>Hierarchy of Biodiversity Sites</u> To ensure a net gain in biodiversity, the following areas will be conserved and enhanced where possible and the council will support their designation and management:</p> <ol style="list-style-type: none"> <li>1. Nationally designated sites: <ul style="list-style-type: none"> <li>• Sites of Special Scientific Interest (SSSI)</li> </ul> </li> </ol>	<p>Policy ENV2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 9.27 and 16.28 and pages 97 to 98) as forming part of the policy context for the Project.</p> <p>The application is accompanied by a full suite of baseline and site specific ecology surveys, described in <b>Section 9.4</b> of the <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> and contained in <b>ES Appendix 9.6.1: Ecological Desk Study</b> <a href="#">[APP-123]</a>, <b>ES Appendix 9. 6.2: Ecology Survey Report Part 2</b> <a href="#">[APP-124]</a>, <b>ES Appendix 9. 6.2: Ecology Survey Report Part 1</b> <a href="#">[APP-125]</a>, <b>ES Appendix 9. 6.2: Ecology Survey Report</b></p>

	<p>SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.</p> <p>2. National Planning Policy Framework Sites</p> <ul style="list-style-type: none"> <li>• Ancient Woodland, and aged or veteran trees</li> </ul> <p>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.</p> <p>3. Locally designated sites, and habitats and species outside designated sites:</p> <ul style="list-style-type: none"> <li>• Local Nature Reserves</li> <li>• Sites of Nature Conservation Importance</li> <li>• Nature Improvement Areas</li> <li>• Habitats of Principle Importance identified in S41 of the Natural Environment and Rural Communities Act 2006 or Biodiversity Action Plans</li> <li>• Biodiversity Opportunity Areas</li> <li>• Where Protected Species are present</li> <li>• Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006.</li> </ul>	<p><b>Part 3</b> <a href="#">[APP-126]</a>, <b>ES Appendix 9. 6.2: Ecology Survey Report Part 4</b> <a href="#">[APP-127]</a>, <b>ES Appendix 9. 6.2: Ecology Survey Report Part 5</b> <a href="#">[APP-128]</a>, <b>ES Appendix 9. 6.2: Ecology Survey Report Part 6</b> <a href="#">[APP-129]</a>, <b>ES Appendix 9. 6.2: Ecology Survey Report Part 7</b> <a href="#">[APP-130]</a>, <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys Part 1</b> <a href="#">[APP-131]</a>, <b>ES Appendix 9.6.3 Bat Trapping and Radio Tracking Surveys Part 2</b> <a href="#">[APP-132]</a> and <b>ES Appendix 9.6.4 Confidential Badger Survey</b> <a href="#">[APP-133]</a> , in accordance with Policy ENV2.</p> <p><b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> provides an assessment of the Project’s effects on international, national, regional/county and local designated sites. The designated sites within the search areas are shown on <b>ES Appendix 9.6.1: Ecological Desk Study</b> <a href="#">[APP-123]</a> and described in <b>Section 9.6 of ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> The assessment reflects the principles of Biodiversity 2020: A Strategy for England’s</p>
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	<p>Proposals which would result in significant harm to biodiversity will be refused unless:</p> <ul style="list-style-type: none"> <li>i. this can be avoided by locating on an alternative site with less harmful impact; or</li> <li>ii. the harm can be adequately mitigated, or, as a last resort, compensated for.</li> </ul>	<p>wildlife and ecosystem services, summarised in <b>Section 9.13 of ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a>.</p> <p>The Project's embedded and good practice mitigation measures are detailed in <b>Section 9.8 of ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a>, together with detailed ecological mitigation strategies in relation to specific species contained in <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys Part 1</b> <a href="#">[APP-131]</a>, <b>ES Appendix 9.6.3 Bat Trapping and Radio Tracking Surveys Part 2</b> <a href="#">[APP-132]</a> and <b>ES Appendix 9.6.4 Confidential Badger Survey</b> <a href="#">[APP-133]</a>. The measures detailed within <b>Section 9.8 of ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> have been designed to ensure that impacts of the Project on ecological receptors are avoided, reduced or mitigated where effects are unavoidable.</p>
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		<p>The Project does not result in the loss or deterioration of ancient woodland and aged or veteran trees.</p> <p>Furthermore, the Project has been designed to achieve Biodiversity Net Gain (BNG). The BNG proposals are set out within <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> [<a href="#">APP-136</a>] and demonstrate that a substantial BNG of over 20% will be achieved.</p> <p>As such, no conflict with Policy ENV2 arises as a result of the Project.</p>
<p><b>Policy ENV4: Open Space, Sport and Recreation</b></p>	<p>Proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless:</p> <ul style="list-style-type: none"> <li>a) An assessment of the needs for open space, sport and recreation clearly show the site to be surplus to requirements; or</li> <li>b) The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> </ul>	<p>Policy ENV4 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 11.12 and page 132) as forming part of the policy context for the Project.</p> <p>Policy ENV4 is addressed in <b>Sections 19.8 and 19.9 of ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>] and <b>Section 8.10 of the Planning Statement</b> [<a href="#">APP-245</a>]. Notably, <b>Section 19.9 of ES Chapter 19: Agricultural Land Use and Recreation</b></p>

	<p>c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p>Whilst a site may be surplus to requirements as open space it may still be of environmental or cultural value; or the site's development may have unacceptable visual or amenity impact, or adversely affect its wider green infrastructure functions, including for climate change mitigation. Therefore, applicants should also carefully consider the character and other environmental policies in the Plan.</p>	<p><a href="#">[APP-044]</a> provides an assessment of the effects on open space during the construction and operation of the Project.</p> <p>These proposals include a number of mitigation elements, such as the provision of replacement open space, new public footpaths and changes to existing public footpaths alongside management measures to maintain safe public access, with these elements being underpinned by <b>ES Appendix 19.6.3 Part A: Recreational User Survey</b> <a href="#">[APP-213]</a>, <b>ES Appendix 19.6.3 Part B: Recreational User Survey</b> <a href="#">[APP-214]</a> and <b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> <a href="#">[APP-215]</a>.</p> <p>The replacement open space land totals 1.95ha, which significantly exceeds the 1.14ha of public open space permanently lost by the Project.</p> <p>Therefore, the scheme complies with Policy ENV4.</p>
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<p>Policy ENV6: Sustainable Design and Construction</p>	<p>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.</p> <p>Proposals for new non-domestic buildings should achieve BREEAM Excellent (for water and energy credits) where technically and financially viable.</p> <p>All development, including the alteration and extension of existing buildings, should consider how it may achieve the following sustainability objectives: In relation to carbon:</p> <ol style="list-style-type: none"> <li>i. Take an active approach to reducing its need to consume energy;</li> <li>ii. Utilise renewable and low carbon energy technologies where appropriate;</li> <li>iii. Look at ways to improve the existing building when adding improvements or extensions;</li> <li>iv. Minimise the amount of carbon emitted throughout the implementation and construction process and ensure any existing embedded carbon onsite is retained;</li> <li>v. Consider the establishment of district energy networks within heat priority areas or near potential sources of waste energy and consider connection or</li> </ol>	<p>Policy ENV6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 15.16, 16.25 and 24.22 and pages 261 to 266, 419) as forming part of the policy context for the Project.</p> <p><b>Sections 8.7 and 8.8</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> sets out the Project’s policy position on greenhouse gas emissions and climate change mitigation, which should be read alongside <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a> and <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a>.</p> <p><b>ES Appendix 5.4.2: Carbon Action Plan</b> <a href="#">[APP-091]</a> describes the actions that the Applicant would take to reduce carbon impacts within its controls. As part of this, the <b>Carbon Action Plan</b> contains the Applicant’s commitments to reduce ABAGO emissions, comprising the emissions arising from the energy use of buildings, infrastructure and operations.</p> <p>The application is accompanied by a <b>Sustainability Statement</b>, forming</p>
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	<p>futureproofing developments for connection (see Policy ENV7);</p> <p>For other locally-specific climate change issues relating to Crawley, all development should consider how it will:</p> <ul style="list-style-type: none"> <li>vi. Tackle the serious water stress in the borough (see Policy ENV9);</li> <li>vii. Cope with future temperature extremes, and ensure it does not unduly increase the impact of heatwave events.</li> </ul> <p>All development involving the creation of a new dwelling or the creation, change of use, or refurbishment of over 100sqm of internal floorspace should submit a Sustainability Statement demonstrating how the sustainability objectives above have been addressed during the design and construction processes. Further details on how these objectives can be addressed can be found in the Planning and Climate Change SPD.</p>	<p><b>Appendix D</b> of the <b>Planning Statement</b> (Doc Ref. 7.1) in accordance with Policy ENV6.</p> <p>In relation to part (vi) of Policy ENV6, the, <b>Design and Access Statement</b> [REP2-032 to REP2-036] and <b>Carbon Action Plan</b> [APP-091] sets out water usage measures that will be considered in the detailed design process.</p> <p>In relation to part (vii), the application is supported by a detailed assessment of the potential effects of current and future climate change on the Project, namely <b>ES Chapter 15: Climate Change</b> [APP-040] and Sectio 8.8 of the <b>Planning Statement</b> [APP-245]. Embedded and existing mitigation measures for climate change adaptation are set out in the ES Chapter 15 and Planning Statement, demonstrating compliance with part (vii) of Policy ENV6.</p>
<p><b>Policy ENV7: District Energy Networks</b></p>	<p>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.</p>	<p>Policy ENV7 is listed in the <b>Joint West Sussex Local Impact Report</b> [REP1-068] (para 16.27 and 24.24 and page 248) as</p>

	<p>Priority areas for the delivery of District Energy Networks are identified on the Local Plan Map.</p> <p>Any major development within the borough, and all development proposals within a priority area for District Energy Networks that would involve the creation of a new dwelling or the creation of over 1000sqm of internal floorspace, should demonstrate how they have considered the following hierarchy:</p> <ul style="list-style-type: none"> <li>i. where a network is in place in the immediate area: connect to an existing District Energy Network; or</li> <li>ii. where a network is not yet in place, development should: <ul style="list-style-type: none"> <li>a) consider developing its own system for supplying energy to any surrounding existing or planned buildings. Any system installed should be compatible with a wider district energy network and developments should ensure that connection to a wider network is facilitated in the future through good design and site layout; or</li> <li>b) consider how it may include site-wide communal energy systems; or</li> <li>c) be “network ready”, optimally designed to connect to a District Energy Network on construction or at some point after construction.</li> </ul> </li> </ul>	<p>forming part of the policy context for the Project.</p> <p>The Project is not located within the allocated priority area for District Energy Networks.</p> <p>Notwithstanding this, <b>ES Appendix 5.4.2: Carbon Action Plan</b> <a href="#">[APP-091]</a> incorporates an ABAGO carbon reduction measure for considering the viability of developing a heat network for the airport. The Project therefore does not conflict with the aspirations of Policy ENV7.</p>
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	<p>An alternative approach to securing decentralised low carbon energy may be justified, on a case-by-case basis, where developments demonstrate that the objectives of Policy ENV7 cannot be achieved in line with the criteria above, due to technical or financial viability, or due to site or development specifics.</p> <p>All development subject to the requirements of Policy ENV7 must be supported through the submission of a Sustainability Statement in compliance with the Planning and Climate Change SPD.</p>	
<p><b>Policy ENV8: Development and Flood Risk</b></p>	<p>Development proposals must avoid areas which are exposed to an unacceptable risk from flooding, and must not increase the risk of flooding elsewhere. To achieve this, development will:</p> <ul style="list-style-type: none"> <li>i. be directed to areas of lowest flood risk, having regard to its compatibility with the proposed location in flood risk terms, and demonstrating (where required) that the sequential and exceptions tests are satisfied;</li> <li>ii. refer to the Environment Agency Flood Map for Planning and Crawley Strategic Flood Risk Assessment to identify whether the development location is situated in an area identified as being at risk of flooding;</li> </ul>	<p>Policy ENV8 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 10.16 and 15.17 and pages 118 to 121) as forming part of the policy context for the Project.</p> <p>Flood risk is assessed within <b>Section 8.12</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>, <b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> and <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[APP-147]</a>. The assessment complies with the requirements of Policy ENV8 in that it provides an assessment of the Project on the water environment, having regarding to</p>

	<ul style="list-style-type: none"> <li>iii. where identified in the SFRA, demonstrate through a Flood Risk Assessment how appropriate mitigation measures will be implemented as part of the development to ensure risk is made acceptable on site, and is not increased elsewhere as a result of the development;</li> <li>iv. ensure that proposals on all sites of 1 hectare or greater are accompanied by a Flood Risk Assessment, to include detail of mitigation demonstrating how surface water drainage from the site will be addressed;</li> <li>v. reduce peak surface water run-off rates and annual volumes of run-off for development through the effective implementation, use and maintenance of SuDS, unless it can be demonstrated that these are not technically feasible or financially viable. Further guidance on how to achieve these objectives will be provided in the Planning and Climate Change SPD.</li> </ul>	<p>the Environment Agency’s Flood Map. The Project has been designed with regard to the findings of the <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[APP-147]</a> and the drainage design for the Project has applied a hierarchical approach to design and includes the use of sustainable drainage techniques.</p> <p>The Project therefore complies with Policy ENV8.</p>
<p><b>Policy ENV9: Tackling Water Stress</b></p>	<p>Crawley is situated within an area of serious water stress, and development should, therefore, plan positively to minimise its impact on water resources and promote water efficiency.</p> <p>New dwellings should where viable and technically feasible, meet the Building Regulations optional requirement for tighter water efficiency. For non-residential development,</p>	<p>Policy ENV9 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 15.21 and 24.23 and pages 245 to 247, 419) as forming part of the policy context for the Project.</p> <p>The Project does not include a target for reduction in potable water use. However</p>

	<p>where technically feasible and viable, development should meet BREEAM Excellent including addressing maximum water efficiencies under the mandatory water credits.</p>	<p>separately to the Project, GAL is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change, such a reduction would exceed the reduction requirements of Policy ENV9. As a conservative approach this reduction has not been taken into account in the ES assessment.</p> <p>It should also be noted that whilst the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its water supply from this location. Water is supplied by Sutton and East Surrey Water who source their water from the River Medway catchment.</p>
<p><b>Policy ENV10: Pollution Management and Land Contamination</b></p>	<p>To prevent unacceptable risks from environmental pollution and land contamination, development, including extensions and intensification of existing uses, will be permitted where the proposed use:</p> <p>a) would not lead to a significant increase (including cumulative increase) in levels of pollution or hazards,</p>	<p>Policy ENV10 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 10.17 and pages 119 to 121) as forming part of the policy context for the Project.</p>

	<p>or where impacts can be appropriately mitigated to ensure impacts are controlled, and as far as possible reduced; and</p> <p>b) is appropriate to its location in that it would not result in unacceptable disturbance or nuisance to the amenity of adjacent land uses and occupiers.</p> <p>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.</p>	<p><b>ES Chapter 10: Ground Conditions</b> [<a href="#">APP-035</a>], <b>ES Appendix 10.9.1: Preliminary Risk Assessment</b> [<a href="#">APP-138</a>] and <b>Section 8.16 of the Planning Statement</b> [<a href="#">APP-245</a>] consider the effects of the Project upon ground conditions including contamination and pollution in accordance with Policy ENV10. In particular, the <b>ES Appendix 10.9.1: Preliminary Risk Assessment</b> [<a href="#">APP-138</a>] has appraised potential areas of land contamination likely to be affected by the Project in accordance with statutory guidance and best practice.</p> <p>As a result of the findings of a number of historical and current potential sources of contamination across the Project site, a series of mitigation measures have been adopted as part of the Project to ensure the land contamination risk has been suitably addressed. The mitigation measures incorporated to minimise these risks are set out in <b>Section 10.8 of ES Chapter 10</b> [<a href="#">APP-035</a>] and principally comprises a remediation strategy. The</p>
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		Project therefore complies with Policy ENV10.
<p>Policy ENV11: Development and Noise</p>	<p>People’s quality of life will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. To achieve this, Policy ENV11 should be read in conjunction with the Local Plan Noise Annex.</p> <p>A. <u>Noise Sensitive Development</u> Residential and other noise sensitive development will be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise disturbance from existing or future uses.</p> <p>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. Proposals that would expose future users of the development to unacceptable noise levels will not be permitted. For transport sources, the Unacceptable Adverse Effect is considered to occur where noise exposure is above 66dB LAeq,16hr (57dB LAeq,8hr at night).</p>	<p>Policy ENV11 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 14.43 and pages 186 to 196) as forming part of the policy context for the Project.</p> <p>The Project has been fully assessed in terms of its potential noise effects in accordance with the requirements of Policy ENV11. <b>ES Chapter 14: Noise</b> <a href="#">[APP-039]</a> and <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> discuss the findings of noise impact assessments arising from air, ground, construction and road traffic noise, with further detail provided in <b>ES Appendices 14.9.1: Construction Noise Modelling</b> <a href="#">[APP-171]</a>, <b>ES Appendix 14.9.2: Air Noise Modelling</b> <a href="#">[APP-172]</a>, <b>ES Appendix 14.9.3: Ground Noise Modelling</b> <a href="#">[APP-173]</a>, <b>ES Appendix 14.9.4: Road Traffic Noise Modelling</b> <a href="#">[APP-175]</a> and <b>ES Appendix 14.9.10: Noise Insulation Scheme</b> <a href="#">[APP-180]</a>.</p>

	<p><b>B. <u>Noise Generating Development</u></b> Noise generating development will only be permitted where it can be demonstrated that nearby noise sensitive uses (as existing or planned) will not be exposed to noise impact that will adversely affect the amenity of existing and future users. Proposals will adhere to standards identified in the Local Plan Noise Annex to establish if the proposal is acceptable in noise impact terms, and will be required to appropriately mitigate noise impacts through careful planning, layout and design. Development that would expose users of noise sensitive uses to unacceptable noise levels will not be permitted.</p> <p><b>C. <u>Noise Impact Assessment</u></b> A Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure. The Noise Impact Assessment will:</p> <ul style="list-style-type: none"> <li>i. assess the impact of the proposal as a noise receptor or generator as appropriate; and</li> <li>ii. demonstrate in full how the development will be designed, located, and controlled to mitigate the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.</li> </ul>	<p>An element of the Project’s proposed mitigation relates to a noise insulation scheme. Full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in <b>Section 8.21</b> of the <b>Planning Statement</b> [<a href="#">APP-245</a>].</p> <p>These documents confirm that, subject to embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration environment. The Project therefore complies with Policy ENV11.</p>
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	<p>In preparing a Noise Impact Assessment, applicants will adhere to Planning Noise Advice Document: Sussex (2013) for further guidance.</p> <p><b>D. <u>Mitigating Noise Impact</u></b> Where proposals are identified as being subject to significant or unacceptable noise impact, either through noise exposure or generation, the best practical means must be employed to mitigate noise impact to an acceptable level.</p>	
<p><b>Policy ENV12: Air Quality</b></p>	<p>Development proposals that do not result in a material negative impact on air quality will normally be permitted. In determining whether or not a development will have a material negative air quality impact, the local planning authority will refer to the criteria set out in Air Quality and Emissions Mitigation Guidance for Sussex.</p> <p>To ensure that development is appropriate in air quality terms:</p> <p>a) Where identified in Air Quality and Emissions Mitigation Guidance for Sussex, development will be required to be supported by evidence detailing the air quality impact of the proposed development, and outlining an appropriate mitigation strategy that will be implemented to ensure that air quality is not materially worsened, and is where possible improved. This may be in the form of an</p>	<p>Policy ENV12 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 13.26 and pages 150 to 156) as forming part of the policy context for the Project.</p> <p>Air quality is considered in <b>Section 8.5</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and assessed in <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a>. The assessment demonstrates that, subject to mitigation measures as set out in <b>Section 13.9</b> of <b>ES Chapter 13 Air Quality</b> <a href="#">[APP-038]</a>, and in <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>, the Project complies with Policy ENV12 and there are not predicted</p>

	<p>Emissions Statement, Mitigation Statement, and/or Air Quality Statement, as appropriate.</p> <p>b) Development proposals within a declared Air Quality Management Area, will demonstrate how mitigation measures will be incorporated that help address objectives identified in the relevant Air Quality Action Plan.</p> <p>c) Development that may reasonably be considered to impact upon air quality beyond the borough boundary, will be expected to contribute towards achieving a reduction in levels of air pollution, and should demonstrate how this will be achieved through an Air Quality Assessment. In all relevant cases, development that cannot demonstrate how material negative air quality impacts will be mitigated may be refused.</p>	<p>to be any significant air quality effects as a result of the Project.</p>
<b>Infrastructure</b>		
<p><b>Policy IN1: Infrastructure Provision</b></p>	<p>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.</p> <p>Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless an equivalent replacement or improvement to services is provided or there is sufficient alternative</p>	<p>Policy IN1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.13 and 24.25) as forming part of the policy context for the Project.</p> <p><b>Section 8.21</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and <b>ES Appendix 5.2.3: Mitigation Route Map</b> <a href="#">[APP-078]</a> summarises details of the Project</p>



	<p>provision in the area.</p> <p>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.</p> <p>Where appropriate and in line with the CIL regulations, Section 106 agreements will address site specific issues.</p>	<p>mitigation, contributions and compensation mechanism proposed. The proposed infrastructure is sufficient to mitigate all effects of the Project such that it would be acceptable in planning terms.</p> <p><b>A draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> is subject to ongoing discussions between the Applicant and the relevant local authorities, and a draft version was submitted at Deadline 2. This therefore demonstrates compliance with Policy IN1.</p>
<p><b>Policy IN3: Development and Requirements for Sustainable Transport</b></p>	<p>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.</p> <p>Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. Developments will be permitted unless the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.</p> <p>In order to consider such impacts, developments that generate significant amount of movements (thresholds as outlined in the Local List) should be supported by a:</p>	<p>Policy IN3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 16.28 and 17.13 and page 265, 275 to 287) as forming part of the policy context for the Project.</p> <p>The <b>Transport Assessment</b> <a href="#">[APP-258]</a> and <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> provide the assessment of the potential transport impacts of the Project, in accordance with Policy IN3. <b>Section 12.6 of ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> explains the existing transport network,</p>

	<p>a) Transport Statement, which assesses the impact of a development with relatively small transport implications; or a</p> <p>b) Transport Assessment, which assesses the impact of a development when there are significant transport implications, and a Travel Plan, which identifies how the development will maximise the usage of sustainable modes of transport as opposed to the private motor vehicle.</p> <p>The applicant should view the Local List of Planning Requirements (or any subsequent document) to ensure that they submit an appropriate Transport Statement or Transport Assessment with their planning application.</p>	<p>public transport routes and cycling and walking network in relation to the Project, and <b>Section 12.8</b> sets out the mitigation and enhancement measures proposed as part of the Project to increase the use of public transport and provide active travel measures.</p> <p>The <b>Transport Assessment</b> <a href="#">[APP-258]</a> also incorporates a Framework Travel Plan that will support the achievement of those targets and outlines proposals for comprehensive monitoring of the mode share. A Travel Plan will also be implemented for construction workers, as part of the wider approach to managing the transport aspects of construction activity. This is set out in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 2 – Outline Construction Workforce Travel Plan</b> <a href="#">[APP-082]</a>, to be secured under Requirement 13 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p> <p>The <b>Transport Assessment</b> <a href="#">[APP-258]</a> contains the assessment of the Project’s impacts on traffic congestion and highway</p>
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		<p>safety in line with Policy IN3. As set out in Section 8.4 of the <b>Planning Statement [APP-245]</b>, the Project will generate increased traffic and transport demands. Overall, however, the Project limits those impacts to acceptable levels, whilst providing enhancements to the local highway network and to active travel and public transport networks.</p> <p>Overall, the Project therefore complies with Policy IN3.</p>
<p><b>Policy IN4: Car and Cycle Parking</b></p>	<p>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. These standards are contained within the Planning Obligations and s106 Agreements Supplementary Planning Document (SPD) or any subsequent similar document.</p> <p>Car parking standards for residential development are based on the accessibility of the area, the levels of car ownership, and the size of any new dwellings.</p> <p>Parking standards for other types of developments will be based on the particular usage of the premises, which will</p>	<p>Policy IN4 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (paras 17.13 and 24.25) as forming part of the policy context for the Project.</p> <p>Commentary on parking provisions as part of the Project is provided against Policy GAT3 below as relating to parking specific to Gatwick Airport.</p>

	<p>take account of the intensity and requirements of each employment usage and the accessibility of an area by public transport and other sustainable modes.</p>	
<p>Policy IN6: Improving Rail Stations</p>	<p>Any improvements or developments at or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations, the sustainable access to individual stations, and:</p> <ul style="list-style-type: none"> <li>a) at Gatwick Station, support its function as an airport-related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses;</li> <li>b) at Three Bridges Station, support its role as a potential parkway station and as a major interchange between the rail, bus and highway network;</li> <li>c) at Crawley Station, support its role as a major gateway to the Town Centre and improve its integration with the main shopping area and bus station;</li> <li>d) at Ifield Station, strengthen its role as a local suburban station meeting the needs of residents in the west of the town.</li> </ul>	<p>Policy IN6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.13) as forming part of the policy context for the Project.</p> <p>The Project does not relate to improvements or development at Gatwick Station which would be brought forward by Network Rail. As such, Policy IN6 is not relevant to the Project.</p>

Gatwick Airport		
<p><b>Policy GAT1: Development of the Airport with a Single Runway</b></p>	<p>Within the airport boundary as set out on the Local Plan Map, the council will support the development of facilities which contribute to the safe and efficient operation of the airport as a single runway, two terminal airport up to 45 million passengers per annum provided that:</p> <ol style="list-style-type: none"> <li>i. The proposed use is appropriate within the airport boundary and contributes to the safe and efficient operation of the airport; and</li> <li>ii. Satisfactory safeguards are in place to mitigate the impact of the operation of the airport on the environment including noise, air quality, flooding, surface access, visual impact and climate change; and</li> <li>iii. The proposed use would not be incompatible with the potential expansion of the airport to accommodate the construction of an additional wide spaced runway.</li> </ol>	<p>Policy GAT1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 8.20, 11.12, 14.45, 15.21, 16.26, 18.15, 23.15 and 24.21 and pages 67, 132 to 133, 186 to 196 and 261 to 263) as forming part of the policy context for the Project.</p> <p>Excluding the proposed surface access works and environmental mitigation areas, the Project's Order Limits are within the Gatwick Airport Boundary defined on CBC's Local Plan Map.</p> <p>The case for the Project is set out in the <b>Needs Case</b> <a href="#">[APP-250]</a> and <b>Planning Statement</b> <a href="#">[APP-245]</a>. These documents, together with the <b>Environmental Statement</b> <a href="#">[APP-026 to APP-217]</a>, demonstrate that that Project complies with parts (i) and (ii) of Policy GAT1.</p> <p>In relation to part (iii), the Project relates to making best use of Gatwick Airport's existing northern runway and does not</p>

		<p>relate to safeguarded land for a further runway to the south of the existing airport.</p> <p>As such, the Project does not conflict with Policy GAT1.</p>
<p><b>Policy GAT2: Safeguarded Land</b></p>	<p><u>Safeguarding for a second runway</u> The Local Plan Map identifies land which will be safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport.</p> <p>Minor development within this area, such as changes of use and small scale building works, such as residential extensions, will normally be acceptable. Where appropriate, planning permission may be granted on a temporary basis. The airport operator will be consulted on all planning applications within the safeguarded area.</p>	<p>Policy GAT2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 15.23, 17.14 and 18.15) as forming part of the policy context for the Project.</p> <p>The Project relates to making best use of Gatwick Airport's existing northern runway and does not relate to safeguarded land for a further runway to the south of the existing airport. As such, the Project does not conflict with Policy GAT2.</p>
<p><b>Policy GAT3: Gatwick Airport Related Parking</b></p>	<p>The provision of additional or replacement airport parking will only be permitted within the airport boundary.</p>	<p>Policy GAT3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.13 and 17.14 and pages 288 to 290) as forming part of the policy context for the Project.</p>

	<p>All new proposals must be justified by a demonstrable need in the context of proposals for achieving a sustainable approach to surface transport access to the airport.</p>	<p><b>Section 3</b> of the <b>Planning Statement</b> [APP-245] and the <b>Needs Case</b> [APP-250] provide the justification for the Project in terms of airport related parking, in compliance with Policy GAT3.</p>
<p><b>GAT4:</b> Employment Uses at Gatwick</p>	<p>Permission for the loss of airport-related office floorspace within the airport boundary will only be permitted if it can be demonstrated that it will not have a detrimental effect on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it expands.</p>	<p>Policy GAT4 is listed in the <b>Joint West Sussex Local Impact Report</b> [REP1-068] (para 18.15) as forming part of the policy context for the Project.</p> <p>The Project proposes to convert an existing office (Destinations Place) to a hotel, and construct a new office building (Car Park H site). As such, the Project does not result in a net loss of airport-related office floorspace at the airport. Therefore, the Project does not conflict with Policy GAT4.</p>

Draft Crawley Borough Local Plan 2023 – 2040 (Modification Consultation version, 12 February – 25 March 2024)		
Policy Reference	Policy Description	Compliance Commentary
<b>Sustainable Development</b>		
<p>Draft Strategic Policy SD1: Presumption in favor of sustainable development</p>	<p>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.</p> <p>The council will work proactively In partnership with applicants, stakeholders and other partners to jointly find solutions which mean that development can be approved wherever possible, whilst securing development that improves the economic, social and environmental conditions of Crawley and the wider Gatwick Diamond and West Sussex and Greater Brighton sub regions.</p> <p>Development will be supported where it meets the following strategic objectives:</p> <ol style="list-style-type: none"> <li>1. Progresses towards Crawley’s commitment to being carbon neutral by 2050 and adapts to climate change;</li> <li>2. Complements Crawley’s character as a compact town within a countryside setting, developed on a</li> </ol>	<p>Draft Policy SD1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 15.23, 18.15 and 24.37) as forming part of the policy context for the Project.</p> <p>In accordance with Draft Policy SD1, matters relating to sustainable development are considered in <b>Sections 7 and 8.2</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and the <b>Sustainability Statement</b> forming <b>Appendix D</b> of the <b>Planning Statement</b> (Doc Ref. 7.1). The Planning Statement and Sustainability Statement is informed by the Environmental Statement, which addresses 13 separate environmental topics in addition to the in-combination and cumulative effects of the Project.</p> <p>Section 9 of the <b>Planning Statement</b> concludes in identifying that the Project is</p>



	<p>neighbourhood principle and maximises the use of sustainable travel;</p> <ol style="list-style-type: none"> <li>3. Conserves and enhances the heritage of the borough;</li> <li>4. Protects, enhances and creates opportunities for Crawley’s unique Green Infrastructure and secures measurable Biodiversity Net Gain;</li> <li>5. Provides a safe and secure environment for its residents and visitors;</li> <li>6. Provides for decent and affordable homes and meets the social and economic needs of Crawley’s current and future population; and</li> <li>7. Accords with the policies and objectives set out in this Plan unless material considerations indicate otherwise.</li> </ol>	<p>a sustainable development and would generate substantial benefits that outweigh the adverse impacts that have been identified. As such, the Project does not conflict with Draft Policy SD1 and it meets the relevant strategic objectives</p>
<p>Draft Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing</p>	<p>New development must be designed to achieve healthy, inclusive and safe places, which enable and support healthy lifestyles and address identified health and wellbeing needs in Crawley.</p> <p>In order to maximise opportunities to enable healthy lifestyles, new development must:</p> <ul style="list-style-type: none"> <li>• Meet the principles of good urban design and support Crawley’s status as a Dementia-Friendly Town, through ensuring legibility of layout, materials and design (Policies CL2 and DD1);</li> <li>• Meet the needs of all through the use of the highest</li> </ul>	<p>Draft Policy SD2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 11.13, 18.15, 20.24 and 24.37 and page 132) as forming part of the policy context for the Project.</p> <p>The socio-economic and health and wellbeing effects of the Project, including those relating to open space, sport and recreation, are assessed within <b>Section 8.3 and 8.19</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>, <b>ES Chapter 17: Socio-</b></p>

	<p>standards of accessible and inclusive design (Policy DD2);</p> <ul style="list-style-type: none"> <li>• Provide opportunities for high quality open space, play and recreation (Policies OS1 – OS2);</li> <li>• Prioritise the use of accessible and reliable sustainable transport and active travel through providing greater levels of safe and attractive opportunities for active travel (Policies OS3, ST1 – ST2);</li> <li>• Be supported by, and not result in a loss of, necessary infrastructure provision (Policies IN1 – IN2);</li> <li>• Ensure proposals are safe for future site users and do not result in unacceptable harmful impacts (Policies EP1 – EP6); and</li> <li>• Ensure proposals incorporate biodiversity and green infrastructure which enable climate change resilience (Policies GI1 and GI3).</li> </ul> <p>Major developments must set out how they address the requirements of Policy SD2 as part of the planning application. In order to satisfy this policy requirement, a Health Impact Assessment must be included with qualifying planning applications, as set out in the Local List of Requirements, at the point of submission for validation purposes.</p>	<p><b>economics</b> <a href="#">[APP-042]</a> and <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a>.</p> <p>The assessment demonstrates the Project complies with Draft Policy SD2 through a combination of its urban design, surface access design and economic mitigation.</p>
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Character, Landscape & Development Form		
<p>Draft Strategic Policy CL2: Making Successful Places – Principles of Good Urban Design</p>	<p>To assist in the creation, retention and/or enhancement of successful places, all new development must:</p> <ul style="list-style-type: none"> <li>i. Meet the design parameters and principles as set out in the National Design Guide (NDG) and National Model Design Code (NMDC), in the absence of locally produced masterplans, design codes or guides.</li> <li>ii. Demonstrate that new proposals have addressed the following in particular:</li> </ul> <p><u>1. Existing Character, Design Vision and Opportunities</u></p> <p>All new development must identify, define and be designed so that proposals respect, protect, build upon and enhance the positive aspects of existing character, significance and distinctiveness of both the site and wider area.</p> <p>For major applications, proposals must demonstrate and document how the positive and valued components of existing, wider area rural/urban structure have guided and directed the form of new development. Area-based character assessment should, and for schemes of moderate density and above must, be used to identify a clear design vision and opportunities available and in turn use these opportunities to define the types of place(s) the proposal aims to achieve. The Assessment, vision and opportunities</p>	<p>Draft Policy CL2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 24.27 and page 418) as forming part of the policy context for the Project.</p> <p>Matters relating to compliance of the Project with the principles of good design set out within this policy are fully considered within <b>Section 7.7</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and the <b>Design and Access Statement</b> [REP2-032 to REP2-036] where in it is demonstrated that the Project utilises principles of good design. The importance of good design is also acknowledged in <b>Section 7</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>.</p> <p>In respect of Part 1 of the policy, the design of the Project has had full regard to the local landscape character and has been assessed in <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-038]</a> and <b>ES Appendix 5.2.2: Operational Lighting Framework</b></p>

	<p>should demonstrate how the proposal will contribute to the sustainable development of the area, and how the existing special qualities of an area will be reflected in new proposals, while not preventing or discouraging appropriate innovation or change (such as increased densities).</p> <p>Design principles and parameters reflecting these must be set out at a broad level for the surrounding area and as detailed design requirements for the site. This can be in the form of masterplans, design guides and/or codes.</p> <p><u>2. Effective Use of Land</u> All new development must identify, test, determine and (where appropriate) embrace opportunities for increased density, and major applications must meet the requirements of Policy CL3 criteria i and ii and Policy CL4.</p> <p><u>3. Built Form, Layout and Movement</u> In considering the layout, scale and arrangement of buildings, streets and landscapes, all new development must:</p> <ul style="list-style-type: none"> <li>i. demonstrate how the components and characteristics of a well-designed place as set out in the National Model Design Code have been considered to create a well-designed proposal;</li> <li>ii. demonstrate how places are experienced (both currently and proposed) including valuable visual</li> </ul>	<p><a href="#">[APP-077]</a> demonstrate that the Project has an acceptable visual impact on the natural landscape. Considerations relating to visual impact to townscape and landscape are embedded within the Project and are assessed within <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> and <b>Section 8.15 of the Planning Statement</b> <a href="#">[APP-245]</a>. The visual impacts are also discussed in the <b>Design and Access Statement</b> [REP2-032 to REP2-036]. The submissions conclude that the Project will result in an acceptable visual impact on Crawley and that any adverse impacts should be afforded limited weight in the planning balance.</p> <p>In respect of Part 2 of the policy, the application proposes to make best use of Gatwick Airport’s existing airport facilities.</p> <p>In respect of Part 1 and 3 of the policy, the application is accompanied by <b>Design Principles</b> (Doc Ref. 7.3) which are to be secured under the <b>Draft DCO</b> <a href="#">[REP1-004]</a> to control the detailed design of the</p>
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	<p>connections into, out, through and beyond the site;</p> <ul style="list-style-type: none"> <li>iii. make connected places that are permeable for people and wildlife;</li> <li>iv. provide recognisable spaces and routes that are attractive, safe, uncluttered and which work effectively for all in society, including disabled and elderly people. Intersections and landmarks should be used and designed to help people find their way around and create places that are legible and easy to read; and</li> <li>v. optimise orientation, solar gain and aspect, for both outdoor space and buildings.</li> </ul> <p>Major applications must:</p> <ul style="list-style-type: none"> <li>a) ensure the proposed urban structure results in active travel movement paths and corridors which are determined by where people want to go within and beyond the development, taking advantage of direct desire lines as much as possible;</li> <li>b) create continuous frontages onto streets and spaces enclosed by development which clearly define private and public areas and ensure streets, footpaths and open spaces are overlooked by buildings; and</li> <li>c) ensure movement corridors and the placing of new development take account of long distant vistas, landmarks, views into and out of adjoining areas, gateways to and between particular areas, and focal points.</li> </ul>	<p>Project. The <b>Design and Access Statement</b> [REP2-032 to REP2-036] presents the Project proposals through a range of media forms, including diagrams, sections and sketch proposals for the reader.</p> <p>Overall, the Project therefore complies with Draft Policy CL2.</p>
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	<p>Major, moderate and high-density range applications should use illustrative tools, such as accurate 3D massing models, to show the basic form of new proposals in relation to their existing setting/surrounding context, particularly from a street level perspective.</p>	
<p>Draft Policy CL3: Movement Patterns , Layout and Sustainable Urban Design</p>	<p>All development should seek to:</p> <ol style="list-style-type: none"> <li>1. Use land more efficiently and sustainably, integrating land uses and movement networks. It should build upon, connect to, enhance and extend sustainable movement, in turn maximising opportunities for compact development and sustainable travel and increased levels of sustainable transport modal share.</li> <li>2. Ensure that buildings are orientated to overlook movement corridors in order to provide passive supervision and safety. Major development should put people before traffic and encourage walking and cycling through establishing a layout of routes, within the proposed site which:             <ol style="list-style-type: none"> <li>i. Understand and respond to the wider borough pattern of movement, demonstrating how walking and cycling connections will enhance and integrate schemes with Crawley town centre, local centres, transportation hubs, schools and employment areas.</li> </ol> </li> </ol>	<p>Draft Policy CL3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 24.37) as forming part of the policy context for the Project.</p> <p>Compliance with Policy CL3 is contained in <b>Sections 7.7, 8.4 and 8.20</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and in the <b>Design and Access Statement</b> <a href="#">[REP2-032 to REP2-036]</a>. These sections confirm that the design of the development has thoughtfully addressed matters of layout and movement, with regard to sustainability. The application is also accompanied by <b>Design Principles</b> (Doc Ref. 7.3) which are to be secured under the <b>Draft DCO</b> <a href="#">[REP1-004]</a> to control the detailed design of the Project.</p>

	<p>ii. Connect, or provide scope for future connection, from new development to areas of rural open space and/or large urban areas of green open space. New route alignments should follow desire lines as much as possible allowing for sustainable travel through routes to be straight and direct, providing clear, legible and obvious linkages to adjoining areas. This should draw active travel routes into and through new sites to create a strong and direct street, path and open space network.</p> <p>A contribution may be required to fund or part-fund the delivery/improvement or expansion of sustainable transport infrastructure (see Policy ST1 and the Planning Obligations Annex).</p>	<p>As part of the application, the Project proposes new and enhanced active travel routes providing safe connections from surrounding areas to Gatwick Airport. These measures are described in further detail in <b>ES Chapter 5: Project Description</b> <a href="#">[APP-030]</a> and <b>ES Chapter 19: Agricultural Land Use and Recreation</b> <a href="#">[APP-044]</a>.</p> <p>The <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a>, subject to ongoing discussions with the relevant local authorities, contains a provision for a Sustainable Transport Fund.</p> <p>The Project therefore complies with Draft Policy CL3.</p>
<p><b>Draft Policy CL5: Significant Development, Masterplanning and Design Success</b></p>	<p>To support applications for significant developments or for a group of smaller sites which, on aggregate, form substantial wider area development, Masterplans will usually be required. In addition to the requirements of Policy CL2, they will need to illustrate and describe how planning and design policies and guidance have been taken into account and how these will be implemented, both within the applicant site and its wider context.</p>	<p>Draft Policy CL5 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 24.28 and page 418) as forming part of the policy context for the Project.</p> <p>The application is accompanied by a suite of design material, including <b>Works Plan</b> <a href="#">[AS-017]</a> and <b>Parameter Plans</b> <a href="#">[APP-019]</a></p>

	<p><u>Masterplanning and Design Codes</u></p> <p>Proportionate masterplans and codes, the identification of opportunities and the design vision based on Area Based Character Assessments must be developed with local communities. Proposals will need to set out an overall vision for the site and its context. These should be prepared as part of area-wide and site-specific design codes, providing indicative and flexible vision for future development form, urban design concepts informed by preliminary technical appraisals and viability testing.</p> <p>Masterplans must chart overall urban design guidance and intent. They should demonstrate:</p> <ol style="list-style-type: none"> <li>i. how a site or series of sites will be developed, implemented and phased;</li> <li>ii. key elements such as the landscape and movement strategy, including connections to the wider street network, the position of different area types, key areas of active frontage and public realm;</li> <li>iii. principles on matters of importance rather than prescribing design in detail.</li> </ol> <p>Applications for particularly significant schemes may be asked to present to a design review panel.</p>	<p>to identify the areas of development and a set of <b>Design Principles</b> (Doc Ref. 7.3). The design principles have been informed by the environmental assessment work and policy considerations and are to be secured under the <b>Draft DCO</b> <a href="#">[REP1-004]</a> to control the detailed design of the Project.</p> <p>Within the <b>Design and Access Statement</b> <a href="#">[REP2-032 to REP2-036]</a> is a series of diagrams and plans to illustrate the existing airport and the Project proposals, structured by eight zones. <b>Design and Access Statement Volume 2</b> <a href="#">[APP-254]</a> and <b>Design and Access Statement Volume 3</b> <a href="#">[APP-255]</a> explains the key development elements of each zone including any landscaping, active travel and access provisions in accordance with Draft Policy CL5.</p>
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<p><b>Draft Policy CL6: Structural Landscaping</b></p>	<p>Areas of trees and soft landscape that make an important contribution to the development of the town and its distinct neighbourhoods, in terms of character and appearance, structure, screening or softening, have been identified on the Local Plan Map as Structural Landscaping. Developments are required to respect and plan for the conservation of the landscape character of the town and should enhance the prominence, legibility and visibility of these natural assets through the orientation and layout of new development.</p> <p>Proposals should protect and/or enhance, including through extending and connecting areas of structural landscaping where appropriate. The visual impact of proposals on structural landscaping should be demonstrated.</p> <p>Where limited or weak structural landscaping can be identified as a negative factor in the attractiveness of an area, opportunities will be sought to deliver enhancements as part of development proposals, this may include improvements to biodiversity and habitat creation where multiple benefits can be achieved.</p>	<p>Draft Policy CL6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (page 69) as forming part of the policy context for the Project.</p> <p>No designated areas of Structural Landscaping are located within the Project boundary. As such, Draft Policy CL6 is not relevant to the Project.</p>
<p><b>Draft Policy CL7: Important and Valued Landscape and Views</b></p>	<p>The following types of 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:</p> <p><u>Linear Contained Views</u></p>	<p>Draft Policy CL7 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 8.22 and 24.37 and page 69) as forming part of the policy context for the Project.</p>

	<p>The robust tree planting that contains the views is essential to their quality and must be protected and/or enhanced. Therefore, all new buildings, structures, signs and advertisements, parked vehicles and hard surfaced areas must be well-screened by trees and other soft landscaping. Development proposals at the end of the view corridor must demonstrate that the view would be protected and/or enhanced.</p> <p>The Boulevard view lies between its junction with the High Street and the Crawley College Tower. Any proposals in the area will be required to retain, or enhance, the vista or to replace it with public realm of equal, or greater, townscape value.</p> <p><u>Long Distance Views</u> 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.</p> <p><u>Valued Landscape and Views</u> More localised Valued Views are identified in Conservation Area Statements and other Supplementary Planning Documents. These form part of the special character of relevant areas. When considering development proposals which affect these views, the objective of protecting or</p>	<p>Commentary on designated 'Long Distance Views' identified on the Local Plan Map is contained against adopted Policy CH8. This demonstrates that the Project would not harm the designated long distance views that cross the existing airport.</p>
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	<p>enhancing them should be given appropriate weight in light of:</p> <ul style="list-style-type: none"> <li>i. Policies HA1-HA7 or other character or design policies relevant to the local area;</li> <li>ii. any national or local heritage-, design- or character-related designation in place for the area.</li> </ul> <p>Area Based Character Assessments, when prepared, will further identify valued localised views and valued landscape. Where such work defines urban and landscape structure, the relationship between landscape, settlement and movement patterns, will be framed and founded upon both long distance and linear views and spatial distinctiveness relative to the surrounding setting.</p> <p>Views out of a site or place are as important as defining from where there are the most important views into a site.</p> <p>The visual impact of proposals affecting Important and Valued Views must be clearly and accurately demonstrated as part of the planning application submission, for example through the use of verified view montages and cross sections.</p>	
<p><b>Draft Policy CL8: Development</b></p>	<p>To ensure that Crawley’s compact nature and attractive setting is maintained, development should:</p>	<p>Draft Policy CL8 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a></p>

<p>outside the Built-Up Area</p>	<ul style="list-style-type: none"> <li>i. Be grouped where possible with existing buildings to minimise impact on visual amenity;</li> <li>ii. Identify existing character and key assets, heritage, landscape and built forms, and recognise the significant qualities of the area, including its grain, aspect, scale, natural resources, views, sense of space and tranquillity to guide any new development;</li> <li>iii. Identify the strategic context of such settings and environments of the town, and respond intelligently to the underlying landscape and environmental systems and form;</li> <li>iv. Maintain a loose-knit, low density rural character clearly differentiating it from development within the urban area;</li> <li>v. Be located to avoid the loss of important on-site views and off-site views towards important landscape and heritage features, understanding how they function and how they are experienced and perceived;</li> <li>vi. Reflect local character, heritage and distinctiveness in terms of form, height, scale, plot shape and size, elevations, roofline and pitch, overall colour, texture and boundary treatment (walls, hedges, fences and gates). Where screening and existing character allows, careful, unique modern new design could be considered;</li> <li>vii. Minimise the impact of lighting to avoid blurring the</li> </ul>	<p>(para 24.37 and pages 67 to 69) as forming part of the policy context for the Project.</p> <p>Commentary regarding development outside the built-up area is provided against adopted Policy CH9. This demonstrates that the Project would not conflict with Draft Policy CL8.</p>
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	<p>distinction between urban and rural areas and in areas which are intrinsically dark to avoid light pollution to the night sky;</p> <ul style="list-style-type: none"> <li>viii. Ensure buildings and any external hard surfacing, parking areas, access roads and outdoor storage are not visually prominent in the landscape;</li> <li>ix. Avoid generating an unacceptable level and/or frequency of noise in areas relatively undisturbed by noise and valued for their recreational or amenity value;</li> <li>x. Avoid generating traffic of a type or amount inappropriate to the rural roads;</li> <li>xi. Ensure access to the countryside is maintained and enhanced from Crawley's neighbourhoods, in accordance with Policy OS3 and demonstrate how such areas can be better experienced; and</li> <li>xii. Avoid introducing a use which by virtue of its operation is not compatible with the countryside.</li> </ul> <p>In addition to the above, all proposals must recognise the individual character and distinctiveness, and the role of the landscape character area or edge in which it is proposed as shown on the Local Plan Map, established by the Crawley Borough Council Landscape Character Assessment, and set out below.</p> <p>Certain types of development may alter one or more</p>	
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important elements that make up a Character Area or Edge. This is acceptable if its overall character and role is not compromised and measures are taken to limit impacts through mitigation and enhancement where possible. This may be the strengthening of other elements of the area's character or general enhancement through increased biodiversity, green links and other mitigation measures as detailed in the Landscape Character Assessment.

Proposals which alter the overall character of the area must demonstrate that the need for the development clearly outweighs the impact on landscape character and is in accordance with national and local policy. Mitigation and/or compensation will be sought in such cases where this can be proven. Applicants are advised to consider the enhancement opportunities identified in the Crawley Borough Landscape Character Assessment.

North East Crawley High Woodland Fringes

Proposals which do not create, or are able to adequately mitigate, visual/noise intrusion are generally supported. This area has an important role in maintaining the separation of the distinct identities of Gatwick Airport, Crawley and Horley.

Upper Mole Farmlands Rural Fringe

Proposals which do not create, or are able to adequately mitigate, visual/noise intrusion are generally supported. This

area has an important role in maintaining the separation of the distinct identity of Gatwick Airport from Crawley and the valuable recreational links from the northern neighbourhoods of Crawley into the countryside.

Extensions to Manor Royal that would deliver new business land may be suitable in this location. Such development must be of a scale that is appropriate to its countryside location, meeting criteria i-vii of this Policy in its relationship with the surrounding countryside.

West of Ifield Rural Fringe

Proposals which respect this area of locally special rural fringe, its nature conservation and recreation value, its positive relationship with the urban edge and links to the wider countryside will be encouraged.

West of Gossops Green/Bewbush Rural Fringe

The green infrastructure along Bewbush Brook and Spruce Hill Brook is of high value and should be protected and linked to green infrastructure in the new neighbourhood, Kilnwood Vale and where other opportunities arise.

South of Broadfield into Buchan Hill Forest and Fringes

The green fingers and local nature reserve will be conserved as they provide existing green infrastructure links with potential for improvement to accessing the countryside and

	<p>wildlife corridors. The area is valued for its quiet recreational opportunities which should be maintained. Proposals should not conflict with the High Weald Area of Outstanding Natural Beauty (AONB) Management Plan objectives.</p> <p><u>Tilgate/Worth Forest and Fringes</u> Proposals within Tilgate Country Park and Worth Conservation Area/Worth Way Local Wildlife Site should conserve and enhance their high landscape and biodiversity value and potential for improved green infrastructure links to other areas.</p> <p>Where development is proposed close to, or within, the High Weald Area of Outstanding Natural Beauty, it should be planned and designed in accordance with Policy CL9.</p>	
<p>Draft Policy CL9: High Weald National Landscape</p>	<p>The council will conserve and enhance the natural beauty and setting of the High Weald National Landscape by having particular regard to the High Weald Management Plan in determining development proposals affecting the National Landscape.</p> <p>Where development is proposed close to, or within, the High Weald National Landscape, consideration of both the visual impacts on the intrinsic scenic qualities of the National Landscape and the impacts of its landscape character or features, must be provided within submitted landscape</p>	<p>Draft Policy 'CH9' is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 8.27) as forming part of the policy context for the Project. The Applicant believes that CBC had intended to refer to Draft Policy CL9 in this instance and therefore this policy is included in this document and responded to below.</p> <p>Commentary on the Project's assessment of its potential effects upon AONBs is</p>



	character assessments.	provided against adopted Policy CH10. This makes clear that the Project would not conflict with Draft Policy CL9.
<b>Design &amp; Development Requirements</b>		
<p>Draft Strategic Policy DD1: Normal Requirements of All New Development</p>	<p>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.</p> <p>All proposals for development in Crawley will be required to:</p> <ul style="list-style-type: none"> <li>a) Provide or retain a good standard of amenity for all existing and future occupants of land and buildings, and not cause unreasonable harm to the amenity of the surrounding area by way of overlooking, dominance or overshadowing, traffic generation and general activity, for example noise, smells and/or vibration;</li> <li>b) Design the orientation and aspect, including the location of habitable rooms in order to optimise solar gain, recognising the influence of the daily sun path and green infrastructure.</li> <li>c) Retain and reuse existing buildings occupying a site or demonstrate why this is not feasible, viable or desirable. This is particularly relevant in the case of</li> </ul>	<p>Draft Policy DD1 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (paras 8.27, 9.32 and 24.29 and pages 68 to 69) as forming part of the policy context for the Project.</p> <p>The Project relates to making best use of Gatwick Airport’s existing northern runway and therefore accords with Draft Policy DD1 in using land efficiently.</p> <p>The importance of good design is acknowledged in <b>Section 7</b> of the <b>Planning Statement [APP-245]</b> and the design of the Project, including its evolution, is set out and justified in full in the <b>Design and Access Statement [REP2-032 to REP2-036]</b>. The <b>DAS</b> and the <b>ES</b> set out the detailed analysis and understanding of the existing site and its surroundings in accordance with part (a),</p>

	<p>building, structures or landscape features that contribute to local character, setting and context;</p> <p>d) Include well-located public spaces that support a wide variety of activities and encourage human interaction to promote health, wellbeing, social and civic inclusion. Streets within residential neighbourhoods should, in particular, be designed to prioritise pedestrians with a focus on social interaction, such as play, communal gatherings and places to sit with neighbours.</p> <p>e) Include development form and architectural quality and specification which complements the existing setting and character of the area, especially where buildings are being replaced;</p> <p>f) For large applications, consider flexible development forms that can respond to changing social, technological and economic conditions and provide diversity and choice through a mix of compatible uses that work together to create viable places that respond to local needs;</p> <p>g) Retain existing individual or groups of trees and green infrastructure and biodiversity assets that contribute positively to the area, and enhance soft landscaping, designing it in as an integral part of the layout. Trees should have sufficient space to reach maturity and sufficient space should also be provided to ensure private gardens would not be</p>	<p>which has informed the design and assessment work.</p> <p>The <b>Design Principles</b> (Doc Ref. 7.3) covers matters contained in Draft Policy DD1 such as requiring building facades to take account of natural light (part b), consider the re-use of existing structures and building fabric (part c) and consider flexibility in the design (part f). The detailed design of the Project must be in accordance with the design principles as set out in Requirement 4 of the <b>Draft DCO</b> [<a href="#">REP1-004</a>].</p> <p>In respect of part (g), the design principles contained in the <b>Design and Access Statement</b> [REP2-032 to REP2-036] and the <b>Outline Landscape and Ecology Management Plan</b> (Doc Ref. 5.3) both secured under the <b>Draft DCO</b> [<a href="#">REP1-004</a>], seek to retain and enhance existing important vegetation and create areas for landscape planting that will provide enhanced screening. A series of new replacement open space and</p>
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	<p>overshadowed by tree canopies and rooms within buildings would receive adequate daylight. All development should meet the standards set out in Policy DD4 where trees would be lost to development and all development should meet the Biodiversity Net Gain requirements set out in Policy GI3;</p> <p>h) Demonstrate how “Secure by Design” principles and guidance set out in “Secured by Design” design guide (as amended) have been incorporated into development proposals to reduce crime, the fear of crime, anti-social behaviour and disorder. Also, for all development, the potential impact on community safety must be carefully considered at the earliest opportunity to ensure that measures are integrated into proposals without compromising other objectives;</p> <p>i) Meet the requirements necessary for their safe and proper use, in particular with regard to access, circulation and manoeuvring, vehicle and cycle parking, loading and unloading, and the storage and collection of waste/recycling; and</p> <p>j) In respect of residential schemes, until bespoke Crawley-based Design Codes are adopted, demonstrate how the criteria outlined in the Urban Design SPD, relevant NDG and NMDC guidance and Building for a Healthy Life has been taken into account for the evaluation of the design quality of residential proposals and would be delivered through</p>	<p>environmental mitigation measures are also proposed as part of the Project.</p> <p>Overall, the Project complies with Draft Policy DD1.</p>
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	<p>the scheme.</p> <p>Major applications and any residential scheme with a density in excess of 45 dwellings per hectare must be supported by an indicative future management and maintenance plan for all shared and all semi-public or semi-private areas of hard and soft landscaping, to ensure these areas become well-established.</p> <p>For all proposals, street scene improvements, public art, CCTV, and access and safety measures (such as fire hydrants), or contributions towards these, will be sought on a site specific basis in accordance with policy and relevant service requirements.</p> <p>Development must be guided by the council's waste and recycling guidance document when designing new developments (or changing the use of existing buildings) within the borough. Consideration must be given to both the internal and external design of properties in order to allow sufficient space for both general waste and recycling provision and to provide adequate and safe access for the council's waste collection contractor.</p>	
<p><b>Draft Policy DD2: Inclusive Design</b></p>	<p>Development proposals are required to achieve the highest standards of accessible and inclusive design possible, ensuring they:</p>	<p>Draft Policy DD2 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.15 and 18.15 and</p>

	<ul style="list-style-type: none"> <li>i. can be entered, used and exited safely, easily and with dignity by all;</li> <li>ii. are convenient and welcoming with no disabling barriers, providing independent access without undue effort, separation or special treatment; and are designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building;</li> </ul> <p>The Design and Access Statement, submitted as part of planning applications, should include an inclusive design statement.</p> <p>All new dwellings must be capable of adapting to the changing needs of residents through the application of Building Regulations Part M Category 2 – accessible and adaptable dwellings. This will be secured through a planning condition. Plans submitted in support of relevant applications must clearly show how the Building Regulations will be met to this level. In exceptional circumstances, flexibility may be applied in the application of this policy requirement for:</p> <ul style="list-style-type: none"> <li>a. specific small scale infill developments;</li> </ul>	<p>page 132) as forming part of the policy context for the Project.</p> <p>The <b>Design Principles</b> (Doc Ref. 7.3) requires the detailed design of the Project to consider accessibility for all users, including in the design of new buildings, car parking and replacement open space areas. The detailed design of the Project must be in accordance with the design principles as set out in Requirement 4 of the <b>Draft DCO</b> [<a href="#">REP1-004</a>].</p> <p>The second part of Policy DD2 is not relevant to the Project, which relates to residential development.</p>
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	<p>b. flats above existing shops or garages; c. stacked maisonettes where the potential for decked access to lifts is restricted.</p> <p>All dwelling extensions and in-fill developments that include a new external entrance must comply with the same Building Regulations for entrances as newly built homes. These require a level or ramped entrance and minimum door width. As with new-build homes, sensible exceptions include where proposals involve protected structures or landscape or where site conditions are difficult, such as on sloping land. Other inclusive features (downstairs toilet, 1500mm turning circle and raised power points) are strongly recommended to be incorporated, where practicable.</p>	
<p><b>Draft Policy DD4: Tree Replacement Standards</b></p>	<p>Tree retention and provision needs to be accounted for at an early stage when designing the layout of new development. Following the completion of surveys and analysis of the site, consideration must be given to which trees are the most suitable for retention:</p> <ul style="list-style-type: none"> <li>i. Trees of the highest quality (those categorised as A and B trees in the Tree Survey) should be retained as part of the proposed layout.</li> <li>ii. Trees of moderate and low value (category C and below) should not automatically be considered for removal, as they may play a useful role in site</li> </ul>	<p>Draft Policy DD4 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (paras 8.27, 9.33 and 24.37 and pages 68 to 69) as forming part of the policy context for the Project.</p> <p>Commentary on tree replanting is provided against adopted Policy CH6 and demonstrates that the Project would comply with the policy requirement based on the current preliminary designs.</p>

screening, or as an important habitat feature.

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. Proposals must demonstrate that the number of replacements accords with the following requirements:

Trunk diameter of each tree (measured in cms at 1.5m above ground level) to be removed:	No. of replacement trees required:
Less than 19.9	1
20 – 29.9	2
30 – 39.9	3
40 – 49.9	4
50 – 59.9	5
60 – 69.9	6
70 – 79.9	7
80+	8

The girth of replacement trees will vary depending on species and location but should balance the need to reduce the likelihood of new tree stock failing to survive whilst providing visual amenity from the outset.

	<p>The replacement tree planting requirements would normally be expected to be met within the development site. Where the local planning authority agrees that this is not feasible or desirable, commuted sums will be sought in lieu on a per tree basis, taking account of constraints to planting. The approach would enable the green character and appearance of the borough to be maintained through tree planting on appropriate and available land.</p> <p>The Manor Royal Design Guide SPD sets out tree planting requirements for sites in Manor Royal.</p>	
<p><b>Draft Policy DD5: Aerodrome Safeguarding</b></p>	<p>Development will only be supported if it is consistent with the continued safe operation of Gatwick Airport.</p> <p>Where required, the Local Planning Authority will consult with the airport operator and/or the operator of technical sites (e.g. radar stations) on relevant proposals in the aerodrome safeguarded areas and in the Public Safety Zones.</p> <p>Proposals that cannot be mitigated to the satisfaction of the statutory consultees are considered a hazard to aircraft safety, and will be refused.</p> <p>Development that would lead to an increase in the number of people living, working or congregating within the Public</p>	<p>Draft Policy DD5 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 8.27, 23.17 and 24.31) as forming part of the policy context for the Project.</p> <p>The Project relates to development by Gatwick Airport Limited, as the operator of Gatwick Airport, and has been designed in compliance with aerodrome safety requirements. The Project therefore does not conflict with Policy DD5.</p>



	<p>Safety Zones will be refused.</p>	
<p>Draft Policy DD6: Advertisements</p>	<p>Applications for express Advertisement Consent will be permitted unless the proposed advert(s) would have a detrimental impact on amenity or public safety, either individually or by virtue of cumulative impact. Relevant factors considered by the council will include:</p> <ul style="list-style-type: none"> <li>a) The impact on visual amenity in the vicinity of the advertisement, taking into account the degree to which it is in scale or keeping with any host building or structure, or with the character of the locality, including scenic, historic, architectural or cultural value or features.</li> <li>b) Any impact on visual or aural amenity, including on light sensitive species and sensitive habitats, in the vicinity arising from lighting or noise associated with the advertisement.</li> <li>c) The potential impact on road safety through:             <ul style="list-style-type: none"> <li>i. obstruction or impairment of sight-lines;</li> <li>ii. obstructing, confusing, or distracting the view of a road user;</li> <li>iii. leaving insufficient vertical or lateral clearance for vehicles;</li> <li>iv. confusion, glare, dazzle or distraction caused by lighting;</li> </ul> </li> </ul>	<p>Draft Policy DD6 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 8.27 and 24.32) as forming part of the policy context for the Project.</p> <p>The DCO application does not entail an application for express Advertisement Consent. As such, Draft Policy DD6 is not relevant to the application.</p>

	<ul style="list-style-type: none"> <li>iv. causing pedestrians to walk or stop in hazardous places;</li> <li>v. misleading resemblance to road traffic signs.</li> </ul> <p>d) The potential impact on railway safety through impairment of the ability of railway personnel to recognise and interpret signals, warning boards, lights, signs and level crossings from the railway.</p> <p>e) The potential impact on the safety of aircraft through glare, resemblance to visual landing guidance signals, proximity to the flight path of aircraft, or impairment of radar or navigational aid equipment.</p> <p>These factors will be interpreted as appropriate in the light of the other policies in this Plan and supporting guidance published by the council.</p>	
<b>Heritage Assets</b>		
<p><b>Draft Strategic Policy HA1: Heritage Assets</b></p>	<p>Crawley’s designated and non-designated heritage assets include:</p> <ul style="list-style-type: none"> <li>• Listed Buildings (see also Policy HA4);</li> <li>• Scheduled Monuments (see also Policy HA7);</li> <li>• Non-designated archaeological assets of equivalent significance to scheduled monuments (see also Policy HA7);</li> <li>• Conservation Areas (see also Policy HA2);</li> </ul>	<p>Draft Policy HA1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 7.15 and pages 52 to 53) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> and <b>Section 8.14</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> form part</p>

- Locally Listed Buildings (see also Policy HA5)
- Areas of Special Local Character (see also Policy HA3);
- Historic Parks and Gardens (see also Policy HA6);
- Other non-designated assets with archaeological interest (see also Policy HA7).

All development should respond to these as a finite resource, providing a distinctive combination of social, economic and environmental benefits. Proposals should seek to ensure that heritage assets' key features or significance are conserved and enhanced as a result of development.

Where a designated heritage asset is affected by a proposal, great weight will be given to its conservation, while harm to, or loss of, its significance will require justification according to the importance of the asset and the degree of loss or harm, in line with local and national policy.

Proposals affecting the significance of a non-designated heritage asset will be considered according to the scale of any harm or loss, and the asset's significance, in line with local and national policy.

Where a development affects a heritage asset or the setting of a heritage asset, a Heritage Impact Assessment will be

of the documentation for the application that consider heritage assets, providing an assessment on the historic environment as required by Draft Policy HA1.

**ES Chapter 7** [[APP-032](#)] is informed by a study of Listed Buildings included within **ES Appendix 7.6.1: Historic Environment Baseline Report** [[APP-101](#)]. Within 1km of the Project site boundary there are a considerable number of designated heritage assets, including two Scheduled Monuments, three Grade I listed churches and eight Grade II\* listed buildings. There are approximately 135 Grade II listed buildings or structures within 3 km of the Project site boundary. Many of these are located within the historic village of Charlwood to the west of the airport and within Horley to the north, whereas others are dispersed farmsteads and cottages in a more rural setting.

Subject to appropriate mitigation (comprising vegetation retention, proposed woodland and tree planting, proposed earth shaping, embankments, cuttings or

	<p>required. This should:</p> <ol style="list-style-type: none"> <li>i. for development proposals meeting criteria set out in the council’s Local List of Planning Requirements: include, and be informed by, the findings of a search of the Historic Environment Record (HER) and/or an Archaeological Desk-based Assessment;</li> <li>ii. in all cases: describe, with reference to relevant sources (such as the National Heritage List for England and Conservation Area Appraisals), the significance of any heritage assets affected and the contribution made by their setting, the impact of the development, and any measures adopted to ensure the heritage asset is respected, preserved or enhanced or, for exceptionally significant development, relocated.</li> </ol> <p>The loss or replacement of a heritage asset may be appropriate in exceptional circumstances, where justified in line with local and national policy on loss or harm, and where it has been demonstrated that:</p> <ul style="list-style-type: none"> <li>• the site is essential to the development’s success;</li> <li>• the benefits of the entire scheme outweigh the loss of the asset; and</li> <li>• any replacement scheme makes an equal contribution to local character and distinctiveness.</li> </ul>	<p>bunds, proposed fences, walls or barriers and measures designed to reduce noise), as secured through <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>, <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, <a href="#">[APP-114]</a>, <a href="#">[APP-115]</a> and <a href="#">[APP-116]</a>, the proposal will not have any unduly harmful effects on Listed Buildings. The Project therefore does not conflict with Draft Policy HA1.</p>
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	<p>In cases where a heritage asset is considered to be suitable for loss or replacement in accordance with local and national policy, and it has been demonstrated that its site is essential to the development's success, proposals will be subject to a requirement to record the asset(s) concerned. The scheme of investigation, including the Historic England Recording Level, is to be agreed with the council in advance of its implementation and will reflect the importance and nature of the asset and the impact of the proposal.</p> <p>Applicants in such cases will also be required to notify any relevant parties including Historic England and submit their recording to the Historic Environment Record.</p> <p>Regeneration proposals that make sensitive use of heritage assets, particularly where these bring redundant or under used buildings or areas, especially any on Historic England's At Risk Register, into appropriate use will be encouraged</p>	
<p><b>Draft Policy HA7: Heritage Assets of Archaeological Interest</b></p>	<p>Development proposals in the vicinity of a Scheduled Monument, or any heritage asset with archaeological interest which is demonstrably of equivalent significance (i.e. 'designated' archaeological assets), will be expected to preserve or enhance the asset and its setting, including through the protection of the asset from disturbance associated with development activity, and through the</p>	<p>Draft Policy HA7 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 7.16 and page 52) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> and <b>Section 8.14</b> of the</p>

	<p>avoidance of patterns of movement or land use which may cause harm to, or loss of, the significance of an asset over time.</p> <p>Development should identify and pursue opportunities to better reveal the significance of such assets. Development proposals affecting designated archaeological assets should be supported by a Heritage Impact Assessment demonstrating an understanding of the asset’s significance, and how this has informed compliance with the requirements identified above.</p> <p>Any harm to, or loss of, the significance of any designated or non-designated archaeological heritage asset involved in a development proposal will be considered in line with national and local policy, according to the significance of the asset and the degree of loss or harm.</p> <p>This consideration will extend to cover heritage assets which are identified, or whose significance is re-evaluated, during the planning and development processes. In order to facilitate this, applications meeting the following thresholds should be supported by an Archaeological Desk-Based Assessment:</p> <ul style="list-style-type: none"> <li>• ground works adjacent to or in the curtilage of a Listed Building;</li> </ul>	<p><b>Planning Statement</b> <a href="#">[APP-245]</a> consider the historic environment in relation to the Project. A full archaeological assessment is made as part of this and is formed of <b>ES Appendix 7.6.2: Archaeological Evaluation Report</b> <a href="#">[APP-102]</a>, <b>ES Appendix 7.6.3: Archaeological Evaluation Report Phase 2 - Longbridge Roundabout and Reigate Field</b> <a href="#">[APP-103]</a> and <b>ES Appendix 7.6.4: Geotechnical Data Review</b> <a href="#">[APP-104]</a>.</p> <p>Subject to appropriate mitigation, as secured through <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>, <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, <a href="#">[APP-114]</a>, <a href="#">[APP-115]</a> and <a href="#">[APP-116]</a>, <b>ES Appendix 7.8.1: WSI for post-consent Archaeological Investigations – Surrey</b> <a href="#">[APP-105]</a> and <b>ES Appendix 7.8.2: Written Scheme of Investigation for post-consent Archaeological Investigations and Historic Building Recording – West Sussex</b> <a href="#">[APP-106]</a>, the proposal will not have any unduly harmful effects on</p>
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	<ul style="list-style-type: none"> <li>any activity within a Scheduled Monument;</li> <li>ground works within a Red Archaeological Notification Area;</li> <li>five or more residential units OR non-residential/mixed use development of over 0.2ha within an Amber Archaeological Notification Area;</li> <li>development outside an Archaeological Notification Area comprising 10 or more new units OR over 0.5ha of non-residential/mixed use development.</li> </ul> <p>Subject to the findings of a Desk-Based Assessment, the council may require field evaluation and the recording and publication of results. In some cases, the council may require assets to be preserved in situ or excavated.</p>	<p>Crawley’s heritage assets. As such, the Project does not conflict with Draft Policy HA7.</p>
<b>Open Space, Sport &amp; Recreation</b>		
<p><b>Draft Policy OS1:</b> Open Space, Sport and Recreation</p>	<p>Proposals that benefit the use of existing open space, sport and recreational spaces will be supported. However, proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless:</p> <ol style="list-style-type: none"> <li>An assessment of the needs for open space, sport and recreation clearly shows the site to be surplus to requirements; or</li> <li>The loss resulting from the proposed development would be replaced by equivalent or better provision in</li> </ol>	<p>Draft Policy OS1 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 7.13 and 11.13 and pages 52 to 53) as forming part of the policy context for the Project.</p> <p>The Project’s impact on existing open space and recreation is addressed in <b>Sections 19.8 and 19.9 of ES Chapter 19: Agricultural Land Use and Recreation [APP-044]</b> and <b>Section 8.10</b></p>

	<p>terms of quantity and quality in a suitable location; or</p> <p>c) The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</p> <p>Whilst a site may be surplus to requirements as open space it may still be of environmental or cultural value. The site's development may have unacceptable visual or amenity impact, or adversely affect its wider green infrastructure functions, including for climate change mitigation. Therefore, applicants should also carefully consider the character, landscape, biodiversity and other environmental policies in the Plan.</p>	<p>of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. Notably, <b>Section 19.9 of ES Chapter 19: Agricultural Land Use and Recreation</b> <a href="#">[APP-044]</a> provides an assessment of the effects on open space during the construction and operation of the Project.</p> <p>These proposals include a number of mitigation elements, such as the provision of replacement open space, new public footpaths and changes to existing public footpaths alongside management measures to maintain safe public access, with these elements being underpinned by <b>ES Appendix 19.6.3 Part A: Recreational User Survey</b> <a href="#">[APP-213]</a>, <b>ES Appendix 19.6.3 Part B: Recreational User Survey</b> <a href="#">[APP-214]</a> and <b>ES Appendix 19.8.1: Public Rights of Way Management Strategy</b> <a href="#">[APP-215]</a>.</p> <p>The replacement open space land totals 1.95ha, which significantly exceeds the 1.14ha of public open space permanently lost by the Project.</p>
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		<p>Therefore, the scheme complies with Draft Policy OS1.</p>
<p><b>Draft Policy OS3: Rights of Way and Public Access to the Countryside</b></p>	<p>Public Rights of Way will be protected by ensuring that development does not result in the loss of, or adversely affect, a Right of Way or other recreational route, unless a new route is provided of equal or better value. When a planning application affects a Public Right of Way, then the application should enhance the Public Right of Way and, where appropriate, improve access to the countryside.</p> <p>Unless it can be clearly shown that a Public Right of Way is unnecessary or not needed, proposals which result in the loss of a Public Right of Way must ensure re-provision of equal or better value.</p> <p>Proposals which detract from the character of a Right of Way or other type of recreational route must adequately mitigate the impacts or provide a new resource of equal or better value if this is not possible.</p> <p>This may include:</p> <ul style="list-style-type: none"> <li>i) the provision of safe and convenient links to nearby Rights of Way/recreational routes; and/or</li> <li>ii) new or upgraded existing Rights of Way to multi-functional routes which improve environmental</li> </ul>	<p>Draft Policy ‘OSC3’ and Draft Policy OS3 are listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 8.24 and 11.13 and pages 68 and 132 to 133) as forming part of the policy context for the Project. Where reference is made to Draft Policy OSC3, the Applicant believes that CBC had intended to refer to Draft Policy OS3.</p> <p>Rights of way and access to the countryside are assessed in <b>Section 8.10</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>, <b>Section 19.9</b> of <b>ES Chapter 19: Agriculture and Recreation</b> <a href="#">[APP-044]</a>, <b>ES Appendix 19.8.1: Outline Public Rights of Way Management Strategy</b> <a href="#">[APP-215]</a> and in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, <a href="#">[APP-114]</a>, <a href="#">[APP-115]</a> and <a href="#">[APP-116]</a>.</p> <p>The assessment demonstrates the Project complies with Draft Policy OS3 and will</p>

	<p>functions and visual amenity to create benefits for a range of users, such as for Non-Motorised Users (walkers, cyclists, equestrians, individuals with disabilities and impairments) and motorised disability users on the urban fringe of the town, with connections both inward to the centre, and outward to the wider countryside.</p>	<p>result in new public rights of way and improvements to existing public rights of way.</p>
<p><b>Infrastructure Provision</b></p>		
<p>Draft Strategic Policy IN1: Infrastructure Provision</p>	<p>Development will be permitted where it is supported by, and coordinated with, the delivery and maintenance of necessary infrastructure both on and off site (including where this infrastructure is located outside of Crawley but serves development within Crawley). For individual proposed developments this includes the provision of mitigation to avoid any substantial cumulative effects on the existing infrastructure services.</p> <p>Existing infrastructure services and facilities will be protected where they contribute to the neighbourhood or town overall, unless there is sufficient alternative provision of the same type in the area, or an equivalent replacement or improvement to services is provided at a location appropriate for serving the affected population.</p> <p>The council will charge Community Infrastructure Levy (CIL)</p>	<p>Draft Policy IN1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.14) as forming part of the policy context for the Project.</p> <p><b>Section 8.21</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and <b>ES Appendix 5.2.3: Mitigation Route Map</b> <a href="#">[APP-078]</a> summarises details of the Project mitigation, contributions and compensation mechanism proposed. The proposed infrastructure is sufficient to mitigate all effects of the Project such that it is acceptable in planning terms.</p> <p>A <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> is subject to ongoing discussions</p>

	<p>on development taking place within the borough in accordance with the council’s adopted CIL charging schedule.</p> <p>Where appropriate, developer contributions will be sought in the form of planning obligations to address site specific issues, in accordance with the tests in the CIL Regulations. The Planning Obligations Annex collates and sets out the anticipated planning obligations associated with the Policies established by this Local Plan.</p> <p>Reference should be made to the council’s Infrastructure Delivery Schedule (IDS) and its updates which identify the Infrastructure projects supporting the Local Plan, and arrangements for their phasing, funding, and delivery. Developments which are required to submit a Transport Assessment in accordance with Policy ST1 should make reference to the IDS and its updates, and to Authority Monitoring Report updates on the implementation of these, in demonstrating the acceptability of their proposals. The need for improved transport infrastructure should be based on up to date information about travel demand as part of the ‘monitor and manage’ process.</p>	<p>between the Applicant and the relevant local authorities, and a draft version was submitted at Deadline 2.</p>
<p><b>Draft Policy IN2: The Location and Provision of New Infrastructure</b></p>	<p>The council will support the provision of new or improved Infrastructure in appropriate locations where the facilities are required to support development, where they improve the medium- or longer-term resilience of infrastructure in</p>	<p>Draft Policy IN2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.14 and 24.37) as forming part of the policy context for the Project.</p>

	<p>Crawley, or where they add to the range and quality of facilities in the town. The council's Infrastructure Delivery Schedule (IDS) and its updates identify a range of infrastructure projects aligned with these objectives.</p> <p>The provision of community facilities alongside housing within sites allocated for uses including housing will be considered acceptable where:</p> <ul style="list-style-type: none"> <li>• there is an evident need for the type of facility concerned;</li> <li>• the infrastructure/facilities are suitable to meet the needs of the community served and the needs of future residents;</li> <li>• the proposal complies with other policies in this Plan, including any site-specific requirements for additional or replacement services, facilities, enhancements, safeguards, investigations and other mitigatory measures.</li> </ul> <p>Subject to the requirements above, education facilities may be considered acceptable as an alternative use on sites allocated for uses including housing where there is a demonstrated educational need arising in Crawley which cannot be met on another site.</p>	<p>The Project proposes key infrastructure elements to support making best use of the existing airport facilities. The infrastructure improvements are located at and in close proximity to the existing airport, being a key existing infrastructure location in the Borough, and therefore in compliance with the first part of Draft Policy IN2.</p> <p>The Project does not propose new housing development and therefore the remaining elements of Draft Policy IN2 are not relevant to the Project.</p>
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	<p>Major facilities providing services on sites which are accessed by the whole town or wider area should be located in the most sustainable locations accessible by public transport and/or active travel routes.</p> <p>Local community facilities should be located close to neighbourhood centres, in the Town Centre, or at suitable locations near Three Bridges Station.</p>	
<b>Economic Growth</b>		
<p><b>Draft Strategic Policy EC1: Sustainable Economic Growth</b></p>	<p>Crawley’s role as the key economic driver for the Coast to Capital and Gatwick Diamond areas will be protected and enhanced. Suitable opportunities are identified within the borough to enable existing and new businesses to grow and prosper.</p> <p>There is need for a minimum of 113,390sqm (26.2 hectares) new business land in the borough which, taking off the opportunities identified in the Employment Land Trajectory, results in an outstanding requirement for a minimum 41,315sqm (13.73 hectares) new B8 industrial, principally storage &amp; distribution land over the period to 2040.</p> <p>Crawley’s recognised economic role and function will be maintained and enhanced through:</p> <ul style="list-style-type: none"> <li>i) Building upon and protecting the established role of Manor Royal as the key mixed business location for</li> </ul>	<p>Draft Policy EC1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 335) as forming part of the policy context for the Project.</p> <p>The Project is anticipated to bring about significant benefits to the local economy, in line with the aspirations of Policy EC1. Further detail on this is set out in the Application, most notably <b>Sections 3 and 8.3</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>, <b>ES Chapter 17: Socio-Economics</b> <a href="#">[APP-042]</a>, <b>ES Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a> and the <b>Needs Case</b> <a href="#">[APP-250]</a>.</p>

	<p>Crawley at the heart of the Gatwick Diamond and Coast to Capital areas;</p> <p>ii) Ensuring that the borough’s Main Employment Areas are protected as locations for sustainable economic growth; Encouraging the redevelopment and intensification of under-utilised sites in Main Employment Areas for employment use;</p> <p>iii) Supporting small extensions to Manor Royal, outside of safeguarding, where this would deliver additional business land, and can be achieved in a manner that is consistent with other Local Plan policies; and</p> <p>iv) Allocation of an industrial-led Strategic Employment Location at Gatwick Green, on land east of Balcombe Road and south of the M23 spur.</p>	<p><b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> <a href="#">[APP-198]</a> sets out the Project’s measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and which will ensure that the local area benefits from new employment opportunities, in line with Draft Policy EC1’s objective.</p>
<p><b>Draft Policy EC2: Economic Growth in Main Employment Areas</b></p>	<p>Crawley’s Main Employment Areas make a significant contribution to the economy of the town and the wider area, and are a focus for sustainable economic growth.</p> <p>Whilst identified as Main Employment Areas, Manor Royal, Gatwick Green, Gatwick Airport and Crawley Town Centre perform a specific employment role which is recognised in individual location-specific Policies EC3, EC4, TC1-TC5, and GAT4.</p> <p>The other Main Employment Areas are:</p>	<p>Draft Policy EC2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 335) as forming part of the policy context for the Project.</p> <p>The Project relates to development at Gatwick Airport and therefore Draft Policy EC2 makes clear that employment growth in this location is subject to a location-specific policy. As such, Policy EC2 is not considered relevant to the Project.</p>

- Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue);
- Maidenbower Business Park;
- Tilgate Forest Business Centre;
- Broadfield Business Park;
- Lowfield Heath;
- Broadfield Stadium and K2 Crawley;
- The Hawth.

Employment generating development will be supported in the seven Main Employment Areas listed above where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth and the overall economic function of Crawley.

Development that would involve a net loss of employment land or floorspace in any Main Employment Area, including Manor Royal, Gatwick Green, Gatwick Airport and Crawley Town Centre, will only be permitted where it is demonstrated that:

- i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a limited loss of employment floorspace will support the wider economic use of the site; and

	<ul style="list-style-type: none"> <li>ii. the loss of any land or floorspace will result in wider social, environmental or economic benefit which clearly outweighs the loss; and</li> <li>iii. there would be no adverse impact on the economic function of the Main Employment Area, nor the wider economic function of Crawley.</li> </ul>	
<p>Draft Policy EC3: Manor Royal</p>	<p>Manor Royal is the principal business location for Crawley, and is instrumental to the economic success of the Gatwick Diamond. Its core business function is a key strength that should be retained and enhanced.</p> <p>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 business sectors of office, research and development, light industry, general industrial and storage or distribution and would result in the reuse, intensification, or change of use of the land or buildings.</p> <p>Development outside of the sectors identified above will be permitted where it can be demonstrated that it is of a scale and function that supports, and does not undermine, the established business role and function of Manor Royal.</p> <p>Development of a dedicated business hub capable of addressing the need for supporting business facilities and staff amenities will be supported. This should be sustainably located and will be expected to provide genuine step-change</p>	<p>Draft Policy EC3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 335) as forming part of the policy context for the Project.</p> <p>The Project does not propose works within the designated Manor Royal business location. As such, Policy EC3 is not relevant to the Project.</p>



	<p>to complement and enhance the business function of Manor Royal.</p> <p>All development should contribute positively to the overall setting and environment of Manor Royal through high quality design and landscaping in accordance with the Manor Royal Design Guide Supplementary Planning Document.</p> <p>Where developments in Manor Royal involve a net increase in gross internal area in excess of 100sqm, the council will seek a proportionate financial contribution towards public realm improvements in Manor Royal, subject to appropriate projects being identified, as set out in the Local Plan Planning Obligations Annex.</p>	
<p>Draft Policy EC4: Strategic Employment Location</p>	<p>Land east of Balcombe Road and south of the M23 spur, referred to as Gatwick Green, is allocated for the comprehensive development of an industrial-led Strategic Employment Location.</p> <p><u>Requirements</u> Proposals for development of the Strategic Employment Location will be required to:</p> <p><i>Employment Uses</i></p> <p>a. Provide as a minimum 13.7317.93ha new industrial land, predominantly for B8 storage and distribution use, demonstrating through appropriate evidence the</p>	<p>Draft Policy EC4 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 335) as forming part of the policy context for the Project.</p> <p>The Project does not relate to development in the designated Gatwick Green employment location. As such, Draft Policy EC4 is not relevant to the Project.</p>

	<p>justification for any further industrial floorspace beyond this amount.</p> <p>b. Justify any limited complementary ancillary uses such as office floorspace, small-scale convenience retail and small-scale leisure facilities that would support the principal industrial-led storage and distribution function.</p> <p><i>Movement and Accessibility</i></p> <p>c. Demonstrate through a Transport Assessment that appropriate access can be provided to the site having regard to both employee and operational movements. This must demonstrate that there will be no severe residual impact on the local and strategic road network, taking into account the operation of Gatwick Airport as nationally significant infrastructure, the allocated Horley Strategic Business Park, and the impact of committed developments in the borough and surrounding areas.</p> <p>d. Demonstrate through a comprehensive Mobility Strategy how the development will achieve the master plan-level vision for the development as regards movement, including through measures and improvements to that maximise sustainable access to the site and optimise the use of sustainable modes of transport as opposed to the private vehicle. The Mobility Strategy will detail infrastructure</p>	
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	<p>improvements that will be required to adequately mitigate the development impacts on the highways network, and set out how these improvements will be delivered and operated. HGV traffic will not be allowed to enter Gatwick Green from the north on Balcombe Road, and will not be allowed to egress the site via a right turn onto Balcombe Road.</p> <ul style="list-style-type: none"> <li>e. Highways infrastructure and improvements that are required as a result of impacts arising from the development must be delivered as part of the development. On the basis that the development will be required to address its own highways impact, a S106 sustainable transport contribution will not be sought.</li> <li>f. Submit a Construction Management and Phasing Plan, to include measures that mitigate any adverse impacts on local and strategic road networks during the construction phase.</li> <li>g. Provide improvements to public transport facilities, including existing bus infrastructure, and measures to maximise the accessibility of routes/services to future occupiers in and around the site.</li> <li>h. Upgrade and extend pedestrian/cycle routes to the site from residential areas in Crawley and Horley and from Gatwick Airport station.</li> </ul>	
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- i. Provide appropriate levels of on-site parking solely for the uses on the site and ensure measures are in place to ensure no airport-related parking occurs.
- j. Submit air quality modelling alongside the Transport Assessment, to include consideration of cumulative impacts.

*Sustainable Design and Construction*

- k. Achieve an exemplar development in sustainability terms, achieving BREEAM Excellent rating, and demonstrating how the development will achieve Net Zero emissions and carbon neutrality by 2050.
- l. Implement an energy strategy developed in accordance with the hierarchy set out in Policy SDC2.
- m. Demonstrate, through a Flood Risk Assessment and Surface Water Drainage Strategy, how drainage and flood risk (including cumulative flood risk) will be taken into account in the design and layout of development, and appropriately mitigated to ensure that the development is safe in flood risk terms and does not increase flood risk elsewhere.
- n. Submit an Agricultural Land Classification Statement evidencing that a robust assessment of agricultural land quality has been undertaken for the allocation site and demonstrating how the requirements of Policy EC13 are satisfied.

	<p><i>Digital Technology</i></p> <ul style="list-style-type: none"> <li>o. Support the needs of 21st century business through the delivery of high quality communications infrastructure including gigabit capable full fibre broadband.</li> </ul> <p><i>Character and Design</i></p> <ul style="list-style-type: none"> <li>p. Be designed and laid out to achieve an appropriate transition to, and relationship with, neighbouring residential and countryside areas, including through appropriate height, massing and siting of buildings and suitable consideration of shared boundaries to include measures to reinforce existing tree and hedgerow screening. Particular regard should be had to the location of the site in the North East Crawley Rural Fringe landscape character area.</li> <li>q. Ensure the height and design of buildings, lighting and other design aspects are consistent with the operational standards of Gatwick Airport with and to respect to aerodrome safeguarding requirements (Policy DD5 refers).</li> <li>r. Include an appropriate landscape buffer, and public open space, to reinforce the distinctive identity of Gatwick Green Strategic Employment Location, and its separation from Gatwick Airport, Horley, and the wider countryside setting of the site.</li> </ul>	
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- s. Provide buildings of an exemplar standard of design to reflect the Strategic Employment Location concept including sufficient flexibility to provide adaptability to cater for a range of, expanding and established businesses and major occupiers and to be complemented by high quality public realm.
- t. Protect and enhance woodland, existing trees and hedgerows where possible and enhance the green/blue infrastructure on site, including the Gatwick Wood Biodiversity Opportunity Area.
- u. Ensure the design of buildings provides appropriate interior environment for users, having regard to the impacts of noise from existing and future sources, particularly air traffic and the M23. Mitigate noise intrusion from activities on the site to adjacent residential and open areas.
- v. Provide measures to minimise the impact of lighting upon neighbouring residential and adjoining countryside areas.
- w. Ensure development proposals conserve the setting of nearby Listed Buildings and Locally Listed Buildings. The retention of important hedgerows will be encouraged as will retention of a buffer to the green corridor along Balcombe Road to retain the historic landscape character.

Impact Assessment

It must be demonstrated how the Strategic Employment Location will address Crawley’s identified need for industrial focused business floorspace, and how its offer will be complementary to the mixed-use business function of Manor Royal, the vitality and viability of Crawley Town Centre, delivery of the allocated office-led Horley Strategic Business Park in Reigate and Banstead borough, and other planned strategic employment development in the functional economic market area.

Delivery

Planning conditions and obligations to control delivery of the development, the use of the site and appropriate off-site considerations will be required, including for infrastructure, open space and social commitments. These will include:

- Requirement for ongoing economic impacts testing.
- Contribute to delivering objectives of the Crawley Employment and Skills Programme, demonstrating through an Employment and Skills Plan (to be agreed by the council) how the development, through its construction and end user phases, will contribute to addressing the local skills gap. This may include, use of local labour, local supply chain procurement and similar skills/capacity support (in conjunction with local education and training providers).

The development of the site will be in accordance with an

	<p>agreed master plan, incorporating a vision-led approach as required by Department for Transport Circular 1/2022, produced by the site promoter in consultation with the council to ensure comprehensive development in line with the above requirements. The master plan will be submitted at the outline planning application stage to assist the consideration of subsequent planning application(s) and must include phasing, programming of infrastructure and details on quantum of development and appropriate uses.</p>	
<p><b>Draft Policy EC5: Employment and Skills Development</b></p>	<p>Major developments will be required to contribute to meeting objectives set out in the most up-to-date Crawley Employment and Skills Programme. This will be achieved through:</p> <ul style="list-style-type: none"> <li>i. Committing at the Planning Application stage to prepare and submit a site-specific Employment and Skills Plan, the content of which must be agreed by the council prior to the commencement of development. This will detail how the development, through its construction and (for commercial development where there is a known occupier) end user phases, will support initiatives identified in the Crawley Employment and Skills Programme. This commitment will form part of the obligations on a planning permission and will be secured by way of a S106 legal agreement.</li> <li>ii. The making of a proportionate financial contribution</li> </ul>	<p>Draft Policy EC5 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 15.23, 17.14 and 18.15 and pages 330 to 336) as forming part of the policy context for the Project.</p> <p>The Project is supported by <b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> [<a href="#">APP-198</a>], to be secured under the Section 106 Agreement in line with Draft Policy EC5. The strategy sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and will ensure the local area benefits from new employment opportunities consistent with the policy objective.</p>



	<p>towards employment and skills initiatives in Crawley.</p> <p>The requirements of parts i. and ii. above should be satisfied in accordance with the Local Plan Planning Obligations Annex.</p>	<p>Alongside this strategy, the <b>draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> includes the provision of an accompanying ESBS fund in line with part ii of Draft Policy EC5.</p>
<p><b>Draft Policy EC6: High Quality Office Provision</b></p>	<p>Development that adds to the supply and variety of high quality Grade A office space in Crawley, including the refurbishment and improvement of existing office floorspace and the provision of new office floorspace, will be supported in the Main Employment Areas.</p> <p>The sequential test will not be required where new Grade A office floorspace is proposed within the Main Employment Areas, or where it is located within 500 metres of a public transport interchange.</p> <p>Within the Gatwick Airport boundary, non-airport related office development should meet the requirements of Policy GAT4.</p>	<p>Draft Policy EC6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy context for the Project.</p> <p>The Project proposes to convert an existing office (Destinations Place) to a hotel, and construct a new office building (Car Park H site). The Project does not result in a net loss of airport-related office floorspace at the airport. Therefore, the Project does not conflict with Draft Policy EC6.</p>
<p><b>Draft Policy EC7: Hotel and Visitor Accommodation</b></p>	<p>Hotel and visitor accommodation should be directed to the Town Centre or Gatwick Airport.</p> <p>Where hotel and visitor accommodation development is proposed outside the Town Centre or Gatwick Airport, compliance with the NPPF sequential test for main town centre uses must be demonstrated.</p>	<p>Draft Policy EC7 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy context for the Project.</p> <p>The Project proposes four additional hotels, namely on the Car Park H site,</p>

	<p>For all hotel and visitor accommodation applications, the specific locational requirements below will apply:</p> <p><u>Gatwick Airport</u> Applications for hotel and visitor accommodation within the Gatwick Airport boundary are exempt from the NPPF ‘town centre first’ approach and application of the sequential test will not be required. It will be necessary to demonstrate that the development will not have a detrimental impact on the long-term ability of the airport to meet operational land and floorspace requirements as it grows. Car parking related to on-airport hotel development must meet the requirements of Policy GAT3.</p> <p><u>Locations outside Gatwick Airport</u> Applications for hotel and visitor accommodation in Manor Royal should demonstrate how the development will cater specifically for the business needs of Manor Royal, including through the provision of business support facilities and staff amenities as per Local Plan Policy EC3 (Manor Royal).</p> <p>Where hotel and visitor accommodation is located outside the Gatwick Airport Boundary, parking provision shall be solely for the use of staff and guests in residence of the development and shall not be block parked or used by for any other purpose, including as off-airport car parking.</p>	<p>north of MSCP3, on the Car Rental Site and through the conversion of Destinations Place hotel. The proposals are explained in <b>ES Chapter 5: Project Description [REP1-016]</b> and on Figure 5.2.1c <a href="#">[AS-135]</a>.</p> <p>The relationship of the proposed hotel within the wider airport and its operational functions are shown through the <b>ES Chapter 5: Project Description [APP-030]</b> and presented through the <b>Design and Access Statement [REP2-032 to REP2-036]</b>. This demonstrates that the Project does not conflict with Draft Policy EC7.</p> <p>The second part of Draft Policy EC7 is not relevant in that the Project does not propose hotel and visitor accommodation outside the existing airport.</p>
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<p>Draft Policy EC11: Employment Development and Amenity Sensitive Uses</p>	<p>The relationship between employment and amenity sensitive uses, particularly residential, must be carefully planned having regard to the ‘agent of change’ principle, to minimise the scope for nuisance.</p> <p>Where residential or amenity-sensitive development is proposed adjacent to Main Employment Areas, the principal concern will be to ensure that the economic function of the area is not constrained. The proposed development must be designed to mitigate impacts from existing or future employment uses on its occupiers. Residential development within the Main Employment Areas, except within the Town Centre, will not be supported.</p> <p>The development, redevelopment or change of use of sites for employment use within or adjacent to residential areas will be permitted only where there is no adverse harm to the amenity, function and setting of nearby residential uses.</p> <p>Particular care should be taken within the Buffer Zones at Manor Royal and Forge Wood, where employment uses will be permitted provided that development would not adversely impact upon the amenity, function and setting of nearby uses.</p>	<p>Draft Policy EC11 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.23, 17.14 and 18.15) as forming part of the policy context for the Project.</p> <p>The effect of the proposed employment uses upon amenity sensitive uses is considered across a range of ES chapters in accordance with the requirements of Draft Policy EC11, for example, <b>ES Chapter 14: Noise and Vibration [APP-039]</b>. Mitigation measures are proposed as part of the Project to ensure that it does not result in any adverse impact on residential or amenity-sensitive development. As such, the Project does not conflict with Draft Policy EC11.</p>
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Gatwick Airport		
<p style="color: #008080; margin: 0;">Draft Strategic Policy GAT1: Development of the Airport with a single Runway</p>	<p>Within the airport boundary as set out on the Local Plan Map, the council will support the development of facilities which contribute to the sustainable growth of Gatwick Airport as a single runway, two terminal airport provided that:</p> <ul style="list-style-type: none"> <li>i. The proposed use is appropriate within the airport boundary and contributes to the safe, secure and efficient operation of the airport;</li> <li>ii. The adverse impacts of the operation of the airport on the environment and the health and living conditions of the local community, including noise, air quality, flooding, surface access, visual impact, and climate change, are minimised, that where necessary satisfactory safeguards are in place to ensure impacts are appropriately mitigated and, as a last resort, fair compensation is secured;</li> <li>iii. Biodiversity net gain is provided and significant harm to biodiversity is avoided. Where this is not possible, suitable safeguards are in place to ensure impacts can be adequately mitigated or, as a last resort, equivalent or greater value for biodiversity compensation is secured;</li> <li>iv. Adequate supporting infrastructure, particularly for surface access, can be put in place; and</li> <li>v. Benefits to Crawley’s local economy and community</li> </ul>	<p>Draft Policy GAT1 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (paras 5.18, 7.14, 9.36, 11.13, 14.46, 15.23, 16.32, 18.15, 23.16 and 24.37 and pages 52, 67 to 69, 132 to 133, 186 to 196, 331) as forming part of the policy context for the Project.</p> <p>Excluding the proposed surface access works and environmental mitigation areas, the Project’s Order Limits are within the Gatwick Airport Boundary defined on CBC’s Local Plan Map.</p> <p>The case for the Project is set out in the <b>Needs Case [APP-250]</b> and <b>Planning Statement [APP-245]</b>. These documents, together with the <b>Environmental Statement [APP-026 to APP-217]</b>, demonstrate that that Project complies with parts (i) and (ii) of Policy GAT1. The Project relates to making best use of Gatwick Airport’s existing northern runway and does not relate to safeguarded land</p>

	<p>are maximised.</p> <p>The control or mitigation of impacts, proportionate compensation, infrastructure and benefits will be secured through appropriate planning conditions and/or S106 obligations.</p> <p>Where development to enable sustainable growth at Gatwick Airport will be a Nationally Significant Infrastructure Project, such as the operational use of the northern runway, i-v above will be taken into account by the council in responding to a DCO, and will be expected to be met by the airport operator and secured through appropriate requirements or S106 obligations.</p>	<p>for a further runway to the south of the existing airport.</p> <p>Matters relating to biodiversity, infrastructure and economic benefits are responded to against topic-specific policies, including adopted Policies ENV2, IN1, IN3 and EC1. This demonstrates that the Project does not conflict with parts iii to v of Draft Policy GAT1.</p> <p>Mitigation measures proposed as part of the Project are proposed to be secured via the <b>Draft DCO</b> <a href="#">[REP1-004]</a> or <b>Section 106 Agreement</b> <a href="#">[REP2-004]</a>, unless covered by separate legislative regimes. The <b>Mitigation Route Map</b> <a href="#">[REP2-011]</a> sets out the mitigation measures and their respective control mechanism.</p>
<p>Draft Policy GAT2: Safeguarded Land</p>	<p><u>Safeguarding for a southern runway</u></p> <p>The Local Plan Map identifies land that is safeguarded from development which would be incompatible with expansion of the airport to accommodate the construction of an additional wide spaced runway (if required by national policy) together with a commensurate increase in facilities that contribute to the safe and efficient operation of the expanded airport.</p>	<p>Draft Policy GAT2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy context for the Project.</p> <p>The Project relates to making best use of Gatwick Airport’s existing northern runway</p>

	<p>Small scale development such as changes of use, minor building works and residential extensions within this area will normally be acceptable. Improvements to existing employment buildings including small scale extensions and refurbishment will normally be acceptable provided it will not lead to a significant intensification or significant increase in the scale of development. Where appropriate, planning permission may be granted on a temporary basis. The airport operator will be consulted on all planning applications within the safeguarded area.</p> <p>Planning applications for noise sensitive development will be considered on the basis of Air Noise Map – Additional Runway – Summer Day – 2040 as shown at Plan 31 of the Gatwick Airport Master Plan and in the Local Plan Noise Annex.</p>	<p>and does not relate to safeguarded land for a further runway to the south of the existing airport. As such, the Project does not conflict with Draft Policy GAT2.</p>
<p><b>Draft Policy GAT4: Employment Uses at Gatwick</b></p>	<p>The loss of airport-related employment floorspace within the airport boundary will be permitted where it can be demonstrated that development will not have a detrimental impact on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it grows.</p> <p>New non-airport related employment floorspace within the airport boundary will only be permitted where it can be</p>	<p>Draft Policy GAT4 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.15) as forming part of the policy context for the Project.</p> <p>The Project proposes to convert an existing office (Destinations Place) to a hotel, and construct a new office building (Car Park H site). As such, the Project</p>

	<p>demonstrated that:</p> <ul style="list-style-type: none"> <li>i. this will not have a detrimental effect on the long term ability of the airport to meet the land and floorspace requirements necessary to meet the needs of the airport as it grows; and</li> <li>ii. it will not have an unacceptable impact on the role and function of the other Main Employment Areas within Crawley borough and town centres and employment areas beyond Crawley’s boundaries</li> </ul>	<p>does not result in a net loss of airport-related office floorspace at the airport. Therefore, the Project does not conflict with Draft Policy GAT4.</p>
<b>Housing</b>		
<p><b>Draft Strategic Policy H1: Housing Provision</b></p>	<p>The council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible, whilst ensuring against detrimental town-cramming or unacceptable impacts on the planned character of the existing neighbourhoods or on residential amenity.</p> <p>Proposals that result in a net loss of dwellings will be resisted.</p> <p>All reasonable opportunities will be considered including: brownfield sites; surplus green space; town centre living; and opportunities on the edge of Crawley, where these are</p>	<p>Draft Policy H1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 332) as forming part of the policy context for the Project. However, the Project does not propose new housing development within CBC’s jurisdiction. As such, Draft Policy H1 is not of relevant to the Project.</p>

	<p>consistent with the other policies and proposals in this Local Plan and the principle of sustainable development.</p> <p>The Local Plan makes provision for the development of a minimum of 5,330 net dwellings in the borough in the period 2023 to 2040.</p> <p>This minimum requirement will be broken down into an annual average requirement on a stepped basis as follows:</p> <ul style="list-style-type: none"> <li>• Years 1-10 (2023-2033): 386dpa</li> <li>• Years 11-17 (2033-2040): 210dpa.</li> </ul> <p>After this supply is deducted from the identified housing need of 12,835 over the period 2023 to 2040, there will be a remaining unmet housing need, of approximately 7,505 dwellings, arising from Crawley over the Plan period. This will arise as follows:</p> <ul style="list-style-type: none"> <li>• Years 1-10 (2023-2033): 369dpa</li> <li>• Years 11-17 (2033-2040): 545dpa.</li> </ul> <p>The council will continue to work closely with its neighbouring authorities, particularly those which form the Northern West Sussex Housing Market Area, in exploring opportunities and resolving infrastructure and environmental constraints in order to meet this need in sustainable locations. This will include continued assessment of</p>	
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	<p>potential urban extensions to Crawley.</p>	
<p>Draft Policy H3: Housing Provision</p>	<p>Housing development in Crawley will be supported where it meets the following criteria, along with the specific requirements set out associated with each of the housing typology sub-policies below (H3a-H3f inclusive):</p> <ul style="list-style-type: none"> <li>i. The principles of Good Urban Design are followed;</li> <li>ii. The principles in relation to Local Character and Design are followed;</li> <li>iii. The presumption in favour of sustainable land use is followed;</li> <li>iv. Local Design Standards and wider borough standards in relation to landscape and urban form are followed;</li> <li>v. A good standard of amenity for all existing and future occupants of land and buildings is provided or retained, including maintaining privacy and preventing overlooking; and avoiding dominance or overshadowing.</li> <li>vi. The scheme would not result in an unacceptable impact on car parking for existing and new residents and occupiers.</li> <li>vii. The scheme meets the internal and external space standards expected by the Local Plan, including being accessible and adaptable, and proposals</li> </ul>	<p>Draft Policy H3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15) as forming part of the policy context for the Project. However, the Project does not propose new housing development within CBC’s jurisdiction. As such, Draft Policy H3 is not of relevant to the Project.</p>

	<p>ensure that rooms within buildings receive adequate daylight.</p>	
<p>Draft Strategic Policy H4: Future Housing Mix</p>	<p>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. However, consideration should be given to the evidence established in the Strategic Housing Market Assessment and its updates for market housing needs and demand in Crawley.</p> <p>In delivering the affordable housing element of residential schemes, in line with Policy H5, the need for one, two and three bedroom affordable dwellings in Crawley, as identified in the council’s Strategic Housing Market Assessment and its updates, should be addressed in meeting the housing needs of those considered to be in greatest need. These should include smaller dwellings designed to meet the needs of families.</p> <p>The expected starting point for the market housing mix, both for schemes of owner occupation and private market rent, and the affordable housing mix is set out in the table below. Applications should explain how they have sought to meet this mix (or any subsequent delivery-adjusted update published with the council’s Authority Monitoring Report) and</p>	<p>Draft Policy H4 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 332) as forming part of the policy context for the Project. However, the Project does not propose new housing development within CBC’s jurisdiction. As such, Draft Policy H4 is not of relevant to the Project.</p>

	<p>provide strong justification for schemes which fail to provide a reasonable balance of property types and sizes, to promote mixed communities.</p> <p>Housing Mix Test: In order to avoid an excessively distorted dwelling mix, major residential developments will be required to meet the following test:</p> <ul style="list-style-type: none"> <li>• Step 1: where applicable, divide the scheme into separate tenures.</li> <li>• Step 2: for each tenure exceeding 4 units within the development, identify the ‘median’ size of unit on a notional development of equivalent tenure, scale and location whose mix matches that stated in the table below or any subsequent delivery-adjusted position published in the council’s Authority Monitoring Report.</li> <li>• Step 3: compare the notional median to the proposed scheme and ensure that neither the proportion of units smaller, nor the proportion of units larger than the notional median, exceeds 90%.</li> </ul>	
<p><b>Draft Policy H5: Affordable Housing</b></p>	<p>An affordable housing contribution will be required from all residential developments, including those providing care regardless of whether it falls into Use Class C2 or C3 where on-site provision is the default expectation while off-site</p>	<p>Draft Policy H5 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 332) as forming part of the policy context for the Project. However, the Project does not propose</p>

	<p>contributions in lieu may be considered in exceptional circumstances.</p> <p><u>Outside the Town Centre</u> On C3 developments, 40% affordable housing will be sought where the council will expect a minimum of 75% of the affordable housing to be Social Rent and/or Affordable Rent and up to 25% as First Homes. This equates to 30% of the total scheme for Affordable/Social Rent and 10% of the total scheme as First Homes, resulting in a 75/25 tenure split.</p> <p>On C2 developments outside the Town Centre, the value of the developer's contribution will be determined by using the Borough-Wide Commuted Sums Calculator, applying the scheme's Net Sale Area (NSA) to account for the gross-net ratio of care schemes.</p> <p><u>Within Crawley Town Centre</u> For residential development resulting in a net increase of at least one new housing unit within the Town Centre, including those providing care regardless of whether it falls into Use Class C2 or C3, 25% affordable housing will be required. The Town Centre Commuted Sums Calculator will be applied in determining the value of the developer's on-site contribution on C2 developments, and/or off-site commuted payments for both C2 and C3 developments where exceptional circumstances apply. In the case of C2</p>	<p>new housing development within CBC's jurisdiction. As such, Draft Policy H5 is not of relevant to the Project.</p>
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	<p>developments, the scheme's Net Sale Area (NSA) will be used to account for the gross-net ratio of care schemes.</p> <p>On C3 developments, the council will expect 60% of the affordable housing in the Town Centre to be Social Rent and/or Affordable Rent, and up to 40% as Intermediate Tenure. The Intermediate element will be expected to comprise at least 25% in the form of First Homes, with the other 15% to comprise First Homes or other Intermediate products, including Shared-Ownership, Shared-Equity or other Affordable Home Ownership tenures. This equates to 15% of the total scheme for Social Rent and/or Affordable Rent and 10% of the total scheme as Intermediate Tenure, resulting in a 60/40 tenure split.</p> <p>In the event of withdrawal of national policy requiring 25% of affordable housing secured through developer contributions to be First Homes, this minimum proportion will be expected to be provided in the form of Shared Ownership homes.</p> <p><u>Sites of 10 dwellings or less</u> For sites of 10 dwellings or less (whether C2 or C3), a commuted sum towards off-site affordable housing provision will be sought, using the Borough-Wide or the Town Centre Commuted Sum Calculator according to the location of the site, unless on-site provision is preferred, with the on-site tenure mix to be agreed as appropriate. For C2 schemes the</p>	
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	<p>relevant Commuted Sum Calculator inputs will be based on Net Sale Area only.</p> <p><u>Affordable Care</u> For traditional Care Homes, in the case of on-site provision, the requirement will be for the on-site provision to be made in the form of affordable care beds in order to meet the Policy.</p> <p><u>Exceptions</u> Except for sites of 10 dwellings or less, payments in lieu will only be accepted in exceptional circumstances where it can be demonstrated that there are robust planning reasons for doing so and provided that the contribution is of equivalent financial value.</p> <p>For high density schemes, as defined in Policy CL4 (i), falling outside the Town Centre, should viability evidence be provided to justify similar levels of affordable housing to that required in the town centre, this will be considered along with claw-back mechanisms to secure higher levels of affordable housing provision, up to the Policy level of 40%, should viability improve during the period of development construction. In exceptional circumstances an off-site commuted payment in lieu may be considered.</p>	
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	<p>The council will only consider relaxing this affordable housing requirement, in part or in full, in exceptional circumstances, where a scheme is clearly subject to abnormal costs, not including land costs, and not otherwise envisaged by the Local Plan Viability Assessment. This must be evidenced by robustly assessed viability appraising various permutations of affordable housing provisions to best address local affordable housing needs which will be independently assessed. Should concessions be agreed by the council then claw-back mechanisms will be expected to be put in place and independently monitored. The scheme must also evidence that it addresses a demonstrative and immediate housing need.</p> <p>Build to Rent will also be considered as an exception while all units remain for rent. This is further detailed in Policy H6, which will revert back to Policy H5 should such schemes cease to be predominantly private rental.</p> <p>Rent to Buy is considered as an exceptional Intermediate Tenure that may be considered only in exceptional circumstances where it can be evidenced to address local housing needs, and will not be considered as an Affordable rental Rent tenure.</p>	
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<p>Draft Policy H6: Build to Rent</p>	<p>A proposal including Build to Rent housing will be supported where it is in conformity with the other policies and requirements of this Local Plan.</p> <p>Build to rent schemes are regarded as an exception to Policy H5, whereby Policy H5 will be deferred for as long as the scheme remains all-rental, during which time Affordable Private Rent is expected on the following basis:</p> <ol style="list-style-type: none"> <li>i. Schemes shall incorporate an element of Affordable Private Rent comprising: <ul style="list-style-type: none"> <li>• 20% of dwellings in schemes within the Town Centre, or</li> <li>• 30% of dwellings in schemes elsewhere in the borough.</li> </ul> <p>In both settings rentals will not exceed either 80% of market rent values or Local Housing Allowance rates, and shall be offered to the council for qualifying nominations on an Assured Shorthold Tenure (AST) basis. Under no circumstances will less than 20% Affordable Private Rent be provided in line with NPPF guidance.</p> </li> <li>ii. A deferred Affordable Housing Scheme is to be identified, for future provision in the event that the scheme ceases to be all-rental, in accordance with</li> </ol>	<p>Draft Policy H6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 332) as forming part of the policy context for the Project. However, the Project does not propose new housing development within CBC's jurisdiction. As such, Draft Policy H6 is not of relevant to the Project.</p>
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	<p>the requirements of Policy H5 (as applicable to the location of the development).</p> <p>iii. The deferred Affordable Housing Scheme will be triggered and delivered in the event that the scheme ceases to be all-rental, and shall be disposed of to a Registered Provider at their best consideration.</p> <p>In order to qualify as Build to Rent for the purposes of this Policy, schemes must adhere to the Build to Rent definition in the Glossary to the NPPF and will be required to enter into a S106 Agreement which will include provision regarding the following issues:</p> <ul style="list-style-type: none"> <li>a) Securing the status of the units as Build to Rent for at least 15 years;</li> <li>b) Securing the unified ownership and unified management across the Build to Rent scheme, embracing both Market Rent and Affordable Private Rent units;</li> <li>c) Affordable housing requirements (including review mechanisms where appropriate) and regular provision of evidence of compliance by the scheme operator;</li> <li>d) Securing council nomination rights in respect of the affordable units through an agreed Deed of Nomination;</li> </ul>	
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	<ul style="list-style-type: none"> <li>e) Clawback mechanisms to secure compensation in the case of the loss of Market Rent homes before the expiry of the covenant period, or in the event that the affordable housing does not fully meet the policy requirement;</li> <li>f) Scheme management arrangements.</li> </ul>	
<b>Draft Policy H9: Housing Provision</b>	<p>Proposals for the development of, and change of use of an existing property to a House in Multiple Occupation will normally be permitted provided that:</p> <ul style="list-style-type: none"> <li>i) The location, design and layout of the development is appropriate for the proposed occupiers;</li> <li>ii) The proposal, by virtue of its intensity of occupation and activity or due to its cumulative impact in the area, would have no adverse impact upon the character of the area and the amenity and privacy of neighbouring properties;</li> <li>iii) Development can meet its operational needs (e.g. parking, servicing) including Crawley Borough Council’s adopted HMO Standards.</li> </ul>	<p>Draft Policy H9 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.15 and page 332) as forming part of the policy context for the Project. However, the Project does not propose new housing development within CBC’s jurisdiction. As such, Draft Policy H9 is not of relevant to the Project.</p>
<b>Green Infrastructure &amp; Biodiversity</b>		
<b>Draft Strategic Policy GI1: Green Infrastructure</b>	<p>Any growing urban area will place additional stress on the natural environment, including the aquatic environment. Crawley’s multi-functional green infrastructure network will</p>	<p>Draft Policy GI1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a></p>

	<p>be conserved and enhanced through the following measures:</p> <ul style="list-style-type: none"> <li>i. Development which protects and enhances green infrastructure will be supported;</li> <li>ii. Development proposals should take a positive approach to designing green infrastructure, utilising the council's supplementary planning documents to integrate link and enhance the network of green assets;</li> <li>iii. Development proposals which reduce, block or harm the functions of green infrastructure should be avoided. Any loss or impact will be required to be adequately justified, minimised, mitigated or, as a last resort, compensated for, to ensure the integrity of the green and blue infrastructure network is maintained;</li> <li>iv. The strategic green infrastructure network is afforded the highest protection due to its high value from existing or identified potential multiple functions, for example as recreation, routeways, access to the countryside, wildlife and climate mitigation;</li> <li>v. Development proposals should maximise the opportunity to maintain and extend green infrastructure links to form a multi-functional network of open space, providing opportunities for walking and cycling, and connecting to the urban/rural fringe and the wider countryside beyond;</li> <li>vi. Cross-</li> </ul>	<p>(para 9.34) as forming part of the policy context for the Project.</p> <p>The Project's considerations for green infrastructure provisions are embedded within the Project and are assessed within <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [APP-033], <b>Section 8.15 of the Planning Statement</b> [APP-245] and <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> (oLEMP) (Doc Ref. 5.3). The oLEMP takes a positive approach to developing an overarching landscape strategy and accompanying landscape principles specific to each zone or particular development feature, to inform the detailed Landscape and Ecology Management Plans.</p> <p>A number of the <b>Design Principles</b> (Doc Ref. 7.3) and secured under the <b>Draft DCO</b> [REP1-004], are focused on delivering new soft landscaping measures that deliver a high quality environment within Gatwick Airport and its surrounding landscape and townscape.</p>
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	<p>boundary matters relating to green infrastructure should be considered and incorporated at the early stage of an application;</p> <p>vi. Large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS and methods that incorporate blue infrastructure into development designs to improve the visual amenity of the development, to account for Policy EP1 and to aid in reducing surface water run-off. Householder developments and small non-residential extensions should take into account Policy EP2 and innovative solutions that incorporate green and blue infrastructure into designs at an early stage.</p> <p>vii. Where possible, Natural England’s Accessible Natural Green Space Standard recommendations and the Woodland Trust’s Woodland Access Standard should be used to assess a development proposal’s location in relation to existing accessible natural green space and woodland. As a minimum, developments should seek to ensure new development proposals meet the Crawley local standards for natural greenspace set out in paragraphs 7.13 and 14.16 relating to quantity, accessibility, quality and value.</p>	<p>Through these documents, which the future detailed design must be in accordance with under the <b>Draft DCO [REP1-004]</b>, the Project aligns with the objectives of Draft Policy GI1.</p> <p>A series of new replacement open space and environmental mitigation measures are proposed as part of the Project, providing new opportunities for walking and cycling in line with part (v) of Draft Policy GI1.</p>
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<p>Draft Strategic Policy GI2: Biodiversity Sites</p>	<p>Up-to-date habitat and species surveys and associated reports will be required to accompany planning applications which may affect the areas listed below or sites showing likely ecological value.</p> <p>If significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as last resort compensated then planning permission should be refused.</p> <p><u>Hierarchy of Biodiversity Sites</u></p> <p>To ensure a net gain in biodiversity, the following areas and their supporting and connecting habitat will be conserved and enhanced and the council will support their designation and management through Management Plans:</p> <ol style="list-style-type: none"> <li>1. Internationally designated sites: <ul style="list-style-type: none"> <li>• Special Area of Conservation (SAC);</li> <li>• Site of Community Importance;</li> <li>• Priority Natural Habitat or Priority Species Site;</li> <li>• Special Protection Area (SPA);</li> <li>• Potential SPA (pSPA);</li> <li>• Proposed SAC (pSAC);</li> <li>• Listed and Proposed Ramsar Site;</li> <li>• Sites identified or required as compensation measures for adverse effects on statutory Internationally designated sites.</li> </ul> </li> </ol>	<p>Draft Policy GI2 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 9.35) as forming part of the policy context for the Project.</p> <p>The application is accompanied by a full suite of baseline and site specific ecology surveys, described in <b>Section 9.4</b> of the <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] and contained in <b>ES Appendix 9.6.1: Ecological Desk Study</b> [<a href="#">APP-123</a>], <b>ES Appendix 9. 6.2: Ecology Survey Report Part 2</b> [<a href="#">APP-124</a>], <b>ES Appendix 9. 6.2: Ecology Survey Report Part 1</b> [<a href="#">APP-125</a>], <b>ES Appendix 9. 6.2: Ecology Survey Report Part 3</b> [<a href="#">APP-126</a>], <b>ES Appendix 9. 6.2: Ecology Survey Report Part 4</b> [<a href="#">APP-127</a>], <b>ES Appendix 9. 6.2: Ecology Survey Report Part 5</b> [<a href="#">APP-128</a>], <b>ES Appendix 9. 6.2: Ecology Survey Report Part 6</b> [<a href="#">APP-129</a>], <b>ES Appendix 9. 6.2: Ecology Survey Report Part 7</b> [<a href="#">APP-130</a>], <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys Part 1</b> [<a href="#">APP-131</a>], <b>ES Appendix 9.6.3 Bat Trapping and Radio Tracking Surveys</b></p>
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	<p>2. Nationally designated sites:</p> <ul style="list-style-type: none"> <li>• Sites of Special Scientific Interest (SSSI)</li> </ul> <p>International Sites and SSSI will receive the highest level of protection for habitat conservation value in line with national legislation, policy and guidance.</p> <p>3. National Planning Policy Framework Sites:</p> <ul style="list-style-type: none"> <li>• Ancient Woodland, and aged or veteran trees</li> </ul> <p>Development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists. A buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice.</p> <p>4. Locally designated sites, and habitats and species outside designated sites:</p> <ul style="list-style-type: none"> <li>• Local Nature Reserves (LNR);</li> <li>• Local Wildlife Sites (LWS);</li> <li>• Nature Improvement Areas;</li> <li>• Habitats of Principle Importance identified in S41 of the Natural Environment and Rural</li> <li>• Communities Act 2006 or Biodiversity Action Plans;</li> <li>• Biodiversity Opportunity Areas;</li> </ul>	<p><b>Part 2 [APP-132]</b> and <b>ES Appendix 9.6.4 Confidential Badger Survey [APP-133]</b> in accordance with Draft Policy GI2.</p> <p><b>ES Chapter 9 [APP-034]</b> provides an assessment of the Project’s effects on international, national, regional/county and local designated sites. The designated sites within the search areas are shown on <b>ES Figure 9.6.1 [APP-048]</b> and described in <b>Section 9.6 of ES Chapter 9: Ecology and Nature Conservation [APP-034]</b>. The assessment reflects the principles of Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services, summarised in <b>Section 9.13 of ES Chapter 9: Ecology and Nature Conservation [APP-034]</b>.</p> <p>The Project’s embedded and good practice mitigation measures are detailed in <b>Section 9.8 of ES Chapter 9: Ecology and Nature Conservation [APP-034]</b>, together with detailed ecological mitigation strategies in relation to specific species contained in <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys</b></p>
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	<ul style="list-style-type: none"> <li>• Where Protected Species are present;</li> <li>• Where Species of Principal Importance are present, as identified in S41 of the Natural Environment and Rural Communities Act 2006.</li> </ul>	<p><b>Part 1</b> <a href="#">[APP-131]</a>, <b>ES Appendix 9.6.3 Bat Trapping and Radio Tracking Surveys Part 2</b> <a href="#">[APP-132]</a> and <b>ES Appendix 9.6.4 Confidential Badger Survey</b> <a href="#">[APP-133]</a></p> <p>The measures detailed within <b>Section 9.8 of ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> have been designed to ensure that impacts of the Project on ecological receptors are avoided, reduced or mitigated where effects are unavoidable.</p> <p>The Project does not result in the loss or deterioration of ancient woodland and aged or veteran trees.</p> <p>Furthermore, the Project has been designed to achieve Biodiversity Net Gain (BNG). The BNG proposals are set out within <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> <a href="#">[APP-136]</a> and demonstrate that a substantial BNG of over 20% will be achieved.</p> <p>As such, no conflict with Draft Policy GI2 arises as a result of the Project.</p>
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**Sustainable Design & Construction**

Draft Strategic Policy SDC1: Sustainable Design and Construction

The following requirements and standards set the strategic framework for the mitigation and adaptation of climate change as part of the development process within Crawley.

**CLIMATE CHANGE MITIGATION**

Development will be required to mitigate climate change in accordance with the following hierarchy:

<b>Be Lean</b>
Where <b>new-build dwellings</b> may be subject to Part L of the 2013 Edition of the 2010 Building Regulations for the purposes of Building Regulations compliance, the relevant Target Emission Rate (TER) should be achieved using building fabric and energy efficiency measures alone.
The <b>‘Be Green’</b> requirement set out below will require further emissions reductions, which may be achieved using low/zero carbon technologies.
<b>Residential developments including 10 or more new homes or incorporating a site area of 0.5 hectares or more</b> will also be required to implement a recognised quality regime to ensure that ‘as built’ environmental performance matches the calculated design performance.
<b>New buildings other than dwellings</b> which may be subject to Part L2A of the 2013 Edition of the 2010

Draft Policy SDC1 is listed in the **Joint West Sussex Local Impact Report [REP1-068]** (paras 7.13, 16.30 and 24.34 and pages 52 to 53, 419) as forming part of the policy context for the Project.

**Sections 8.7 and 8.8** of the **Planning Statement [APP-245]** sets out the Project’s policy position on greenhouse gas emissions and climate change mitigation, which should be read alongside **ES Chapter 15: Climate Change [APP-040]** and **ES Chapter 16: Greenhouse Gases [APP-041]**.

**ES Appendix 5.4.2: Carbon Action Plan [APP-091]** describes the actions that the Applicant would take to reduce carbon impacts within its controls. As part of this, the Carbon Action Plan contains the Applicant’s commitments to reduce ABAGO emissions, comprising the emissions arising from the energy use of buildings, infrastructure and operations.



	<p>Building Regulations for the purposes of Building Regulations compliance should achieve the relevant Target Emission Rate (TER) through fabric and energy efficiency measures alone.</p> <p>The <b>‘Be Green’</b> requirement set out below will require further emissions reductions, which may be achieved using low/zero carbon technologies.</p> <p><b>Other developments</b> meeting the thresholds for submission of a Sustainability Statement (detailed below) should detail their consideration of the potential for building fabric and energy efficiency measures, and any specific measures proposed.</p> <p>These proposals will usually trigger building regulations requirements, and proposals for meeting these should be set out.</p> <p><b>All developments</b> required to submit a Sustainability Statement should be designed and implemented as far as possible to minimise the amount of carbon emitted throughout the development process and to limit the loss of any existing embedded carbon onsite, including through consideration of the feasibility of retrofitting and reusing existing buildings. The incorporation of this approach within the development process should be detailed in the Sustainability Statement.</p>	<p>The application is accompanied by a <b>Planning Statement Appendix B Sustainability Statement</b> <a href="#">[APP-249]</a> in accordance with Draft Policy SDC1.</p> <p>As required by Draft Policy SDC1, the <b>Design and Access Statement</b> [REP2-032 to REP2-036] and <b>Carbon Action Plan</b> <a href="#">[APP-091]</a> sets out water usage measures that will be considered in the detailed design process.</p> <p>The application is supported by a detailed assessment of the potential effects of current and future climate change on the Project, namely <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a> and <b>Section 8.8</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. Embedded and existing mitigation measures for climate change adaptation are set out in the <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a> and <b>Planning Statement</b> <a href="#">[APP-245]</a>, demonstrating compliance with Draft Policy SDC1.</p> <p><b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> and <b>ES Appendix 11.9.8:</b></p>
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	<p style="text-align: center;"><b>Be Clean</b></p> <p>Developments should consider and respond to the potential to supply their energy needs, particularly for electricity, heating and cooling, by means of decentralised energy generation in accordance with <b>Policy SDC2</b>.</p> <p style="text-align: center;"><b>Be Green</b></p> <p><b>All developments</b> required to submit a Sustainability Statement should use renewable and low carbon energy technologies, where appropriate, or where required to meet specific emissions standards for new buildings. This should include use of available roof-space for solar PV where possible.</p> <p><b>New-build dwellings</b> will be required to meet whichever of the following standards is more efficient in respect of carbon dioxide emissions:</p> <ul style="list-style-type: none"> <li>a) a reduction of at least 19% against the Target Emission Rate (TER) set by the 2013 Edition of the 2010 Building Regulations (Part L);</li> <li>b) a new mandatory national emissions standard, introduced via Building Regulations or otherwise.</li> </ul> <p><b>New buildings other than dwellings</b> will be required to undergo BREEAM certification and achieve the 'minimum standards' for BREEAM Excellent within the Energy and Water categories, except where it is demonstrated that this is not technically feasible.</p> <p style="text-align: center;"><b>CLIMATE CHANGE ADAPTATION</b></p>	<p><b>Water Supply Assessment</b> <a href="#">[APP-151]</a> together with <b>Section 8.12</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and the Planning Statement Appendix B: <b>Sustainability Assessment</b> <a href="#">[APP-249]</a> demonstrate the compliance of the Project with the policy in respect of drainage and climate change. The Project has been designed with regard to the findings of the Flood Risk Assessment <b>ES Appendix 11.9.6: Flood Risk Assessment</b> <a href="#">[APP-147]</a> and incorporates allowances for Climate Change. The drainage design for the Project has applied a hierarchical approach to design and includes the use of sustainable drainage techniques.</p> <p>The submissions confirm that flood risk will not be increased and that acceptable surface water run-off rates are to be achieved.</p> <p><b>ES Appendix 11.9.8: Water Supply Assessment</b> <a href="#">[APP-151]</a> considers the Project's likely impact on water supply. Water demand will increase due to increase in passenger, staff and</p>
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	<p><b>All developments</b> required to submit a Sustainability Statement should contribute to the tackling of the serious water stress in the borough in accordance with <b>Policy SDC3</b>. All development within the Sussex North Water Resource Zone will be required to achieve water neutrality in accordance with <b>Policy SDC4</b>.</p> <p><b>New dwellings, other new buildings, and material changes of use</b> (as defined by the Building Regulations) will be required to cope with future temperature extremes, and mitigate the potential of the development to increase the impact of heatwave effects, in accordance with the cooling hierarchy:</p> <ul style="list-style-type: none"> <li>• Minimise internal heat generation through energy efficient design;</li> <li>• Reduce the amount of heat entering a building in summer through orientation, shading, albedo, fenestration, insulation and green roofs and walls;</li> <li>• Design to enable passive ventilation (e.g. cross ventilation);</li> <li>• Provide mechanical ventilation;</li> <li>• Provide active cooling (ensuring they are the lowest carbon options).</li> </ul> <p><b>SUSTAINABILITY STATEMENT THRESHOLDS</b> All proposals involving the types of development listed below must be supported by a Sustainability Statement detailing</p>	<p>construction worker numbers through the existing Project boundary, during construction, and following completion of the terminal improvements and additional hotel and commercial facilities. This is to be partially mitigated through introduction of water efficiencies during construction of new facilities. There are no significant effects either during the construction phase or the operational phase</p>
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	<p>the performance of the development against these requirements, including proposed approaches to achieving relevant Building Regulations requirements, minimising the loss of embodied carbon, and the avoidance of overheating:</p> <ul style="list-style-type: none"> <li>• Creation of a dwelling (including by conversion);</li> <li>• Creation of 100sqm or more of new-build floorspace;</li> <li>• Extension of a building which already comprises 1000sqm or more;</li> <li>• The following changes of use, where cumulatively affecting 100sqm or more:             <ul style="list-style-type: none"> <li>- Non-E-class to E-class;</li> <li>- Non-C-class to C-class;</li> <li>- Non-F-class to F-class.</li> </ul> </li> </ul> <p><b>RENEWABLE AND LOW CARBON ENERGY DEVELOPMENTS</b></p> <p>Proposals for renewable and low carbon energy installations and infrastructure of a type and scale appropriate to the character of the borough (including the presence of Gatwick Airport) will be supported where any adverse impacts are (or can be made) acceptable.</p> <p>Further details on how the council will apply this policy can be found in the Planning and Climate Change SPD.</p>	
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<p>Draft Policy SDC2: District Energy Networks</p>	<p>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.</p> <p>Priority areas for the delivery of District Energy Networks (DEN) are identified on the Local Plan Map.</p> <p>Any major development within the borough meeting the thresholds for submitting a Sustainability Statement detailed in Policy SDC1, and all development proposals within a priority area for District Energy Networks that would involve the creation of a new dwelling or the creation of over 1000sqm of internal floorspace, must incorporate an energy strategy developed in accordance with the following hierarchy:</p> <ul style="list-style-type: none"> <li>i. where a network is in place in the immediate area: connect to an existing District Energy Network;</li> <li>ii. where a network is not yet in place:             <ul style="list-style-type: none"> <li>a) incorporate within the development a system for supplying energy to any surrounding existing or planned buildings. Any system installed should be compatible with a wider district energy network and developments should ensure that connection to a wider network is facilitated in the future through good design and site layout;</li> </ul> </li> </ul> <p>or</p>	<p>Draft Policy SDC2 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 7.13 and 24.35 and pages 52 to 53) as forming part of the policy context for the Project.</p> <p>The Project is not located within the allocated priority area for District Energy Networks.</p> <p>Notwithstanding this, <b>ES Appendix 5.4.2: Carbon Action Plan [APP-091]</b> incorporates an ABAGO carbon reduction measure for considering the viability of developing a heat network for the airport. The Project therefore does not conflict with the aspirations of Draft Policy SDC2.</p>
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	<ul style="list-style-type: none"> <li>b) include site-wide communal energy systems; or</li> <li>c) demonstrate that the development will be “network ready”, i.e. optimally designed to connect to a District Energy Network on construction or at some point after construction.</li> </ul> <p>iii. where a development has demonstrated that the preceding options cannot be achieved, due to technical feasibility, or due to site or development specifics, an alternative approach to incorporating low- or zero-carbon technology energy may be justified, on a case-by-case basis. These developments will be required to supply a proportion of their regulated energy needs from low- or zero-carbon sources located on or near the site as follows:</p> <ul style="list-style-type: none"> <li>a) For major developments within a DEN priority area: at least 20%;</li> <li>b) For major developments outside a DEN priority area, or minor developments within a DEN priority area including the creation of a new dwelling: at least 10%.</li> </ul> <p>Where a connection to an existing District Energy Network is proposed, the council may secure the implementation of this by means of a planning obligation.</p> <p>All development within the categories identified above must be supported through the submission of a Sustainability</p>	
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	<p>Statement in compliance with the Planning and Climate Change SPD.</p>	
<p>Draft Policy SDC3: Tackling Water Stress</p>	<p>Development will be planned to a high standard of water efficiency to help address serious water stress. Where development is located outside the Sussex North Water Resource Zone, the following requirements apply:</p> <ul style="list-style-type: none"> <li>a) New residential development will be designed to utilise no more than 110 litres of mains supplied water per person per day, as per the Building Regulations optional requirement for tighter water efficiency;</li> <li>b) New non-domestic buildings will be designed to meet the minimum standards for BREEAM 'Excellent' within the Water category.</li> </ul> <p>These standards will be required unless superseded by any tighter national standard introduced during the Local Plan period that are applicable in an area of serious water stress.</p> <p>Non-residential extensions and changes of use which are required to submit a Sustainability Statement in accordance with Policy SDC1 will be required to achieve water efficiencies equivalent to the minimum Water standards for BREEAM 'Excellent', unless this is shown to be unfeasible.</p> <p>Applicants must demonstrate how they have achieved the</p>	<p>Draft Policy SDC3 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.23 and 24.36 and page 419) as forming part of the policy context for the Project.</p> <p>The Project does not include a target for reduction in potable water use. However separately to the Project, GAL is aiming to reduce potable water consumption by 50% by 2030 compared to 2019 as part of its ongoing Second Decade of Change, such a reduction would exceed the reduction requirements of Draft Policy SDC3. As a conservative approach this reduction has not been taken into account in the ES assessment.</p> <p>It should also be noted that whilst the airport is located within the Sussex North Water Supply Zone that is subject to restrictions on development regarding water neutrality, it does not receive its</p>

	<p>requirements of this Policy within their Sustainability Statement as required by Policy SDC1.</p>	<p>water supply from this location. Water is supplied by Sutton and East Surrey Water who source their water from the River Medway catchment.</p>
<b>Environmental Protection</b>		
<p>Draft Policy EP1: Development and Flood Risk</p>	<p>Development must avoid areas which are exposed to an unacceptable risk from flooding, and must not increase the risk of flooding elsewhere. To achieve this, development will:</p> <ul style="list-style-type: none"> <li>i. be directed to areas of lowest flood risk having regard to its compatibility with the proposed location in flood risk terms, and, where required, demonstrating that first the sequential test and, if needed, the exception test are satisfied;</li> <li>ii. where located in Flood Zones 2 or 3, and for all major development in Flood Zone 1 or where otherwise required by the NPPF, demonstrate through a Flood Risk Assessment how appropriate mitigation measures will be implemented to ensure that over the lifetime of the development and taking climate change into account, that flood risk is acceptable on site, and is not increased elsewhere as a result of the development;</li> <li>iii. demonstrate that peak surface water run-off rates and annual volumes of run-off will be reduced through the</li> </ul>	<p>Draft Policy EP1 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 10.18 and 15.23 and pages 118 to 121) as forming part of the policy context for the Project.</p> <p>Flood risk is assessed within <b>Section 8.12</b> of the <b>Planning Statement</b> [<a href="#">APP-245</a>], <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>] and <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [<a href="#">APP-147</a>]. The assessment complies with the requirements of Draft Policy EP1 in that it provides an assessment of the Project on the water environment, having regard to the Environment Agency’s Flood Map. The Project has been designed with regard to the findings of the <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [<a href="#">APP-147</a>] and the drainage design for the Project has</p>



	<p>effective implementation, use and maintenance of SuDS, unless it can be demonstrated that these are not technically feasible or financially viable;</p> <p>iv. make appropriate provision for surface water drainage to ground, water courses or surface water sewers. Surface water will not be allowed to drain to the foul sewer;</p> <p>v. not be permitted to take place within 8 metres from the top of any Main River or 12 metres from any Ordinary Watercourse, nor within 3 metres of any sewer system without prior consent from the appropriate authority;</p> <p>vi. post construction, provide to the council certification of the drainage works from a third party professional. This should not be the consultant who designed the drainage features. This will be to ensure that the drainage details and design submitted for planning application has been constructed in line with the submitted documents.</p>	<p>applied a hierarchical approach to design and includes the use of sustainable drainage techniques. The Project therefore complies with Draft Policy EP1.</p>
<p><b>Draft Policy EP3: Land and Water Quality</b></p>	<p>People’s health and quality of life, property and the wider environment will be protected from unacceptable risks of, and adverse effects associated with, radioactivity, chemical substances and biological agents in land.</p> <p>Development will adhere to the appropriate local and national standards, procedures and principles to ensure that,</p>	<p>Draft Policy EP3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 10.19 and pages 119 to 120) as forming part of the policy context for the Project.</p>

	<p>having undertaken appropriate land quality assessment, remediation, and protection, the land is suitable for the proposed use.</p> <p><u>A. Sensitive Development</u> Development on land that is affected by the above pollutants will be permitted where it can be clearly demonstrated that the development, its future occupiers and the wider environment will not be exposed to unacceptable risk from, or be adversely affected by, land contamination.</p> <p><u>B. Development With Potential For Causing Land Contamination</u> Development that has the potential to cause land contamination will only be permitted where the applicant demonstrates that:</p> <ul style="list-style-type: none"> <li>i. adequate measures will be put in place to protect land quality and any receiving waters;</li> <li>ii. there will be no adverse impacts to occupiers of neighbouring land or the wider environment as a result of the development.</li> </ul> <p>There are complementary pollution control regimes that also have this effect, and therefore the planning regime is only relevant where these pollution control regimes do not exist</p>	<p><b>ES Chapter 10: Geology and Ground Conditions</b> <a href="#">[APP-035]</a> and <b>Section 8.16</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> provides an assessment of the effects of the Project on geology and ground conditions, including an evaluation of existing ground conditions and the nature of any potential contamination present. As demonstrated in the assessment and through adopting the mitigation measures proposed, the site has been found to be suitable for its intended use in terms of contamination and the Project will not contribute to or be put at risk from existing land contamination.</p> <p><b>ES Chapter 11: Water Environment</b> <a href="#">[APP-036]</a> and <b>Section 8.13</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> address these policy requirements with respect to water quality. The assessment demonstrates that the Project will not result in any unacceptable levels of water pollution or any significant impacts on water resources. Aspects of the Project will have benefits for water quality and resources.</p>
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		<p>The Project therefore does not conflict with Draft Policy EP3.</p>
<p><b>Draft Policy EP4: Development and Noise</b></p>	<p>People’s health, quality of life and cognitive ability and development will be protected from unacceptable noise impacts by managing the relationship between noise sensitive development and noise sources. To achieve this, Policy EP4 should be read in conjunction with the Local Plan Noise Annex, and development is required to adhere to the provisions and standards contained within it.</p> <p><u>A. Noise Sensitive Development</u></p> <p>Residential and other noise sensitive development will only be permitted where it can be demonstrated that users of the development will not be exposed to unacceptable noise impact from existing, temporary or future uses. In the case of development likely to experience noise or effects within the Significant Observed Adverse Effects Level, only when it is first proven that it is necessary to develop in that location having taken all circumstances into account will permission be considered.</p> <p>Noise sensitive uses proposed in areas that are exposed to noise above the Lowest Observed Adverse Effect Level (LOAEL) or within the Significant Observed Adverse Effect Level (SOAEL) from existing or future industrial, commercial</p>	<p>Draft Policy EP4 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 14.44 and pages 186 to 196) as forming part of the policy context for the Project.</p> <p>The Project has been fully assessed in terms of its potential noise effects in accordance with the requirements of Policy ENV11. <b>ES Chapter 14: Noise</b> <a href="#">[APP-039]</a> and <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> discuss the findings of noise impact assessments arising from air, ground, construction and road traffic noise, with further detail provided in <b>ES Appendices 14.9.1: Construction Noise Modelling</b> <a href="#">[APP-171]</a>, <b>ES Appendix 14.9.2: Air Noise Modelling</b> <a href="#">[APP-172]</a>, <b>ES Appendix 14.9.3: Ground Noise Modelling</b> <a href="#">[APP-173]</a>, <b>ES Appendix 14.9.4: Road Traffic Noise Modelling</b> <a href="#">[APP-175]</a>, <b>ES Appendix 14.9.5: Air Noise Envelope</b></p>

or transport (air, road, rail and mixed) sources will only be permitted where; in the case of effects within SOAEL there is no alternative; and in all cases it can be demonstrated good acoustic design has been considered early in the planning process, and that all appropriate mitigation, through careful planning, layout and design, will be undertaken to ensure that the noise impact for future users will be made acceptable. Noise sensitive uses proposed in areas that are exposed to noise at the Unacceptable Adverse Effect level will not be permitted.

For surface transport noise sources, the Unacceptable Adverse Effect Level is considered to occur where noise exposure is above 66dB LAeq,16hr (57dB LAeq,8hr at night).

For aviation transport sources the Unacceptable Adverse Effect is considered to occur where noise exposure is above 60dB LAeq,16hr. (57dB LAeq,8hr at night).

**B. Noise Generating Development**

Noise generating development will be permitted where it can be demonstrated that nearby noise sensitive uses (as existing or planned) will not be exposed to noise impact that will adversely affect the amenity of existing and future users. Proposals will adhere to standards identified in the Local Plan Noise Annex to establish if the proposal is acceptable

[[APP-177](#)], **ES Appendix 14.9.8: Noise Envelope Group Output Report** [[APP-178](#)] and **ES Appendix 14.9.10: Noise Insulation Scheme** [[APP-180](#)]. An element of the Project's proposed mitigation relates to a noise insulation scheme. Full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in **Section 8.21 of the Planning Statement** [[APP-245](#)].

These documents confirm that, subject to embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration environment. The Project therefore complies with Draft Policy EP4.

in noise impact terms, and where required will, through good acoustic design, appropriately mitigate noise impacts through careful planning, layout and design. Noise Generating Development that would expose users of noise sensitive uses to Unacceptable Adverse Effect noise will not be permitted.

C. Noise Impact Assessment

A Noise Impact Assessment will be required to support applications where noise sensitive uses are likely to be exposed to significant or unacceptable noise exposure. The Noise Impact Assessment will:

- i. assess the impact of the proposal as a noise receptor or generator as appropriate; and
- ii. demonstrate in full how the development will be designed, located, and controlled to mitigate the impact of noise on health and quality of life, neighbouring properties, and the surrounding area.

In preparing a Noise Impact Assessment, applicants will adhere to Planning Noise Advice Document: Sussex (2023 or latest revision) and ProPG (Professional Practice Guidance on Planning & Noise for New Residential Developments) for further guidance. Where there is conflict between these documents and the Local Plan, the Local Plan documents take precedent.

	<p><u>D. Mitigating Noise Impact</u></p> <p>Where proposals are identified as being in the Lowest Observed Adverse Effect Level (LOAEL) or the Significant Observed Adverse Effect Level (SOAEL) categories, either through noise exposure or generation, all reasonable mitigation measures must be employed to mitigate noise impacts to an acceptable level that is as low as is reasonably achievable. Appropriate mitigation must be delivered as part of the development to ensure that the impacts of existing or known potential future noise sources are acceptable on the use being applied for by the applicant.</p>	
<p>Policy EP5: Air Quality</p>	<p>People’s health, quality of life and the wider environment shall be protected from the significant adverse effects of atmospheric pollution.</p> <p>Development should help to improve air quality and enhance the environment. New and existing development will be prevented from contributing to, being put at risk from, or being adversely affected by atmospheric pollution. To achieve this, development will be required to prevent, or where this is not practicable, minimise the generation of pollutants that would result in a deterioration in air quality and to prevent exposure to poor air quality.</p> <p>To ensure that air quality is appropriately taken into account in the planning of development, applicants will adhere to</p>	<p>Draft Policy EP5 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 13.27 and pages 150 to 156) as forming part of the policy context for the Project.</p> <p>Air quality is considered in <b>Section 8.5</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> and assessed in <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a>. The assessment demonstrates that, subject to mitigation measures as set out in <b>Section 13.9</b> of <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> and in <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>, the Project complies with Draft</p>

	<p>national and local guidance, including the Local Plan Planning Obligations Annex and Air Quality and Emissions Mitigation Guidance for Sussex (2021 or latest version) which should be used to identify if:</p> <ul style="list-style-type: none"> <li>a) an Emissions Mitigation Statement is required as part of a planning application;</li> <li>b) an Air Quality Impact Assessment is required as part of a planning application.</li> </ul> <p>To reduce the overall background levels of pollution, sustainable design principles shall be incorporated into the development to ensure that the residual local emissions of air pollution are prevented or, where this is not practicable, minimised. This shall include high standards of insulation, the selection of low emission technology for heating and power; and the provision of facilities for sustainable transport including electric vehicle charge infrastructure and charge points.</p> <p>Planning permission will only be granted where it can be demonstrated that the development:</p> <ul style="list-style-type: none"> <li>i. has appropriately factored air quality into the location, design and operation of development, and where necessary, provided appropriate mitigation; and</li> <li>ii. will not result in a deterioration of air quality within an AQMA; and</li> <li>iii. will not lead to the declaration of a new AQMA; and</li> </ul>	<p>Policy EP5 and there are not predicted to be any significant air quality effects as a result of the Project.</p>
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	<p>iv. does not conflict with the requirements of an air quality action plan; and v. will not result in an increase in exposure within an AQMA.</p> <p><u>Odour</u> Where amenity sensitive development is proposed within 800 metres of a Waste Water Treatment Works an Odour Impact Assessment will be required as part of the planning application. This should confirm that either there will be no adverse amenity impact for occupiers of the proposed development, or demonstrate how appropriate mitigation will be provided to ensure the development is appropriate in amenity terms.</p> <p><u>Development of Industrial and Commercial Use</u> Development that includes industrial and commercial land uses must submit appropriate detailed evidence to enable assessment of potential significant adverse air quality impacts. Mitigation measures should be included in proposals where evidence suggests a likely significant adverse effect.</p>	
<p>Draft Policy EP6: External Lighting</p>	<p>Development must demonstrate how it will minimise light pollution to avoid significant harm to biodiversity and public and highway safety, and prevent unacceptable sky glow, glare, light spillage and unnecessary energy usage.</p>	<p>Draft Policy EP6 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 8.26 and 24.33 and pages 67 to 69) as forming part of the policy context for the Project.</p>



	<p>Development will normally be permitted where:</p> <ol style="list-style-type: none"> <li>1. the minimum amount of lighting necessary to achieve its purpose is specified; and</li> <li>2. outdoor lighting is well designed, low impact, and appropriate in terms of its intensity, height, and use of fittings and structures; and</li> <li>3. outdoor lighting does not cause unacceptable detriment to public and highway safety, nor biodiversity, in particular priority habitat and species.</li> <li>4. The design and specification of the lighting minimises sky glow, glare and light spillage in relation to local character, the visibility of the night sky, the residential amenities of adjoining occupiers, and public safety; and</li> <li>5. Low energy lighting is used; and</li> <li>6. Where lighting of a landmark feature is proposed, the level and type of illumination would enhance the feature itself.</li> </ol> <p>Further information on lighting is provided in the Urban Design Supplementary Planning Document.</p>	<p><b>ES Appendix 5.2.2: Operational Lighting Framework</b> <a href="#">[APP-077]</a> is provided as part of the application. This sets out the framework for the use of external lighting for the operation of the Project. The framework sets out objectives for the operational lighting, such as to mitigate impacts associated with lighting on sensitive receptors (such as residents, heritage sites, and local flora and fauna) and to consider energy efficiency in the design and operation of lighting.</p> <p>The <b>Design Principles</b> (Doc Ref. 7.3) will inform the lighting of the detailed design for the Project and secured by the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p> <p>As such, the Project does not conflict with Draft Policy EP6.</p>
<p><b>Sustainable Transport</b></p>		
<p>Draft Strategic Policy ST1: Development and</p>	<p>Development should be located and designed so as to encourage travel via the walking and cycling network and public transport routes, while reducing dependency on travel</p>	<p>Draft Policy ST1 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a></p>

<p>Requirements for Sustainable Transport</p>	<p>by private motor vehicle (also see Chapter 4). This should include:</p> <ul style="list-style-type: none"> <li>i. Designing developments to prioritise the needs of pedestrians, cyclists and users of public transport over ease of access by the motorist;</li> <li>ii. Providing an appropriate amount and type of parking in accordance with Policy ST2;</li> <li>iii. Phasing the development process so that walking and cycling infrastructure forming part of the development is in place and usable at the point of first occupation;</li> <li>iv. For development which generates a significant demand for travel, and/or is likely to have other transport implications: contributing to improved sustainable transport infrastructure off-site, including, where appropriate, bus priority measures, enhanced passenger information, and routes identified in the council’s Local Cycling and Walking Infrastructure Plan, especially in the areas identified in Policy CL3 as appropriate for Moderate and High Density residential form;</li> </ul> <p>Developments should meet the access needs they generate and not cause an unacceptable impact in terms of increased traffic congestion or highway safety. Developments will be considered acceptable in highways terms unless there</p>	<p>(paras 17.14 and 24.37) as forming part of the policy context for the Project.</p> <p>The <b>Transport Assessment</b> <a href="#">[APP-258]</a> and <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> provide the assessment of the potential transport impacts of the Project, in accordance with Policy IN3. <b>Section 12.6 of ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> explains the existing transport network, public transport routes and cycling and walking network in relation to the Project, and <b>Section 12.8</b> sets out the mitigation and enhancement measures proposed as part of the Project to increase the use of public transport and provide active travel measures. The <b>Transport Assessment</b> <a href="#">[APP-258]</a> also incorporates a Framework Travel Plan that will support the achievement of those targets and outlines proposals for comprehensive monitoring of the mode share.</p> <p>The <b>Transport Assessment</b> <a href="#">[APP-258]</a> contains the assessment of the Project’s impacts on traffic congestion and highway</p>
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	<p>would be an unacceptable impact on highway safety, or the cumulative impact on the transport network is severe and cannot be satisfactorily mitigated.</p> <p>In order to consider such impacts, developments that generate a significant amount of movements (thresholds as outlined in the Local List of Planning Requirements) should be supported by a:</p> <ul style="list-style-type: none"> <li>a) Transport Statement, which assesses the impact of a development with relatively small transport implications, and a Travel Plan Statement, which identifies how the development will maximise the usage of sustainable modes of transport as opposed to the private motor vehicle; or a</li> <li>b) Transport Assessment, which assesses the impact of a development when there are significant transport implications (including consideration of the requirements of Policy IN1: Infrastructure Provision), and: <ul style="list-style-type: none"> <li>• for large developments (for example, large-scale major residential developments or any strategic developments), a Mobility Strategy; or,</li> <li>• for other developments, a Travel Plan.</li> </ul> </li> </ul> <p>The Mobility Strategy or Travel Plan will identify:</p> <ul style="list-style-type: none"> <li>• how the development will optimise the usage of</li> </ul>	<p>safety in line with Policy IN3. As set out in Section 8.4 of the <b>Planning Statement [APP-245]</b>, the Project will generate increased traffic and transport demands. Overall, however, the Project limits those impacts to acceptable levels, whilst providing enhancements to the local highway network and to active travel and public transport networks.</p> <p>The Project therefore complies with Draft Policy ST1.</p>
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	<p>sustainable modes of transport as opposed to the private motor vehicle;</p> <ul style="list-style-type: none"> <li>• appropriate improvements to sustainable modes, or the introduction of new infrastructure that is required to adequately mitigate development impacts and detail how this will be delivered and operated.</li> </ul> <p>The applicant should view the Local List of Planning Requirements (or any subsequent document) to ensure that they submit an appropriate Transport Statement or Transport Assessment with their planning application.</p>	
<p>Draft Policy ST2: Car and Cycle Parking Standards</p>	<p>Development will be permitted where the proposals provide the appropriate amount and type of car and cycle parking to meet its needs when it is assessed against the borough council’s car and cycle parking standards. These standards are contained in the Parking Standards Annex to this Plan.</p> <p>Car parking standards for residential development are based on the accessibility of the area, the levels of car ownership, and the size of any new dwellings.</p> <p>Parking standards for other types of developments will be based on the particular usage of the premises, which will take account of the intensity and requirements of each use and the accessibility of an area by public transport and other</p>	<p>Draft Policy ST2 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (paras 17.14 and 24.37) as forming part of the policy context for the Project.</p> <p>The <b>Transport Assessment</b> <a href="#">[APP-258]</a>, <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a> and <b>Section 8.4 of the Planning Statement</b> <a href="#">[APP-245]</a> consider the Project in terms of the car parking and cycle standards and demonstrates an acceptable provision of both in line with anticipated needs but also in view of the mode share commitments. The Project</p>

	<p>sustainable modes.</p>	<p>therefore complies with Draft Policy ST2, where relevant to the Project.</p>
<p>Draft Policy ST3: Improving Rail Stations</p>	<p>Any improvements or developments at or within the vicinity of railway stations will be expected to enhance the specific roles of the individual stations, the sustainable access to individual stations, and:</p> <ul style="list-style-type: none"> <li>a) at Gatwick Station, support its function as an airport-related interchange and provide opportunities for broadening the function of the station as an interchange for surface travellers using rail, coach, Fastway and other buses consistently with the safe and efficient operation of the airport;</li> <li>b) at Three Bridges Station, support its role as a potential parkway station and as a major interchange between the rail, bus, highway, cycle and pedestrian network;</li> <li>c) at Crawley Station, support its role as a major gateway to the Town Centre and improve its integration with the main shopping area and bus station and accessibility by cycle and pedestrians;</li> <li>d) at Ifield Station, strengthen its role as a local suburban station meeting the needs of current and future residents in the west of the town.</li> </ul> <p>For further policy guidance relating to land close to the</p>	<p>Draft Policy ST3 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.14) as forming part of the policy context for the Project.</p> <p>The Project does not relate to improvements or development at Gatwick Station which would be brought forward by Network Rail. As such, Draft Policy ST3 is not relevant to the Project.</p>

	<p>borough’s rail stations, please see Policy CL4.</p>	
<p>Draft Policy ST4: Area of Search for a Crawley Western Multi- Modal Transport Link</p>	<p>The Local Plan Map identifies an Area of Search for a Crawley Western Multi-Modal Transport Link connecting the A264 with the A23.</p> <p>The design and route of the Western Multi-Modal Transport Link must take account of:</p> <ol style="list-style-type: none"> <li>a. its impact on (but not limited to): <ul style="list-style-type: none"> <li>• existing properties which could be affected by the final route;</li> <li>• residential and commercial properties close to the final route;</li> <li>• the flood plain;</li> <li>• the rural landscape;</li> <li>• local biodiversity;</li> <li>• sports pitch provision and recreation facilities; and</li> <li>• heritage and heritage landscape assets and visual intrusion.</li> </ul> </li> <li>b. the desirability and requirements of bus priority measures (including future proofing for forecast traffic growth and congestion).</li> <li>c. land safeguarded at Gatwick Airport for potential future southern runway expansion.</li> </ol>	<p>Draft Policy ST4 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.14) as forming part of the policy context for the Project.</p> <p>The identified Area of Search for a Crawley Western Multi-Modal Transport Link is not within the Project boundary. As such, Draft Policy ST4 is not relevant to the Project.</p>

	<p>d. protected sites and habitats, through identification of the potential impacts on these.</p> <p>Connectivity by non-vehicular modes of transport between Crawley’s urban neighbourhoods and the wider Sussex countryside should be maintained and enhanced.</p>	
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## 2 References

Crawley Borough Council (2008) Development at Gatwick Airport Supplementary Planning Document. Adopted November 2008.

Crawley Borough Council (2015) Crawley 2030: Crawley Borough Council Local Plan 2015 – 2030. Adopted December 2015.

Crawley Borough Council (2024) Crawley Local Plan: Draft Crawley Borough Local Plan 2023 – 2040: Modifications Consultation: 12 February – 25 March 2024.

## 3 Glossary

Term	Description
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
NRP	Northern Runway Project
oLEMP	Outline Landscape and Ecology Management Plan



## Annex B: Local Planning Compliance Table – Mole Valley District Council

## 1 Local Planning Policy Compliance Tables – Annex B – Mole Valley District Council

### 1.1. Introduction

1.1.1 This document comprises a Local Planning Policy Compliance Table in respect of Mole Valley District Council's (MVDC) Development Plan, setting out local planning policies that are of relevance to the Northern Runway Project (NRP) and the extent to which the NRP complies with those policies.

1.1.2 As made clear in the **Planning Statement** [APP-245], national policy provides the primary planning policy framework for the consideration and determination of the Project. However local planning policy can also be important and relevant. Where any conflicts arise between local and national policy, national planning policy would prevail. **Appendix C** [APP-248] of the Planning Statement contains the Planning Policy Compliance Tables which identify and test the NRP against national planning policy.

1.1.3 This document:

- identifies MVDC's local policies which may be relevant to the consideration of the Project, including any specific local policies related to Gatwick Airport; and
- provides a summary of the Project's compliance with MVDC's policies, including cross references to documents forming part of the DCO application where additional detailed information can be found.

1.1.4 This document has been prepared taking account of the **Joint Surrey Councils Local Impact Report (LIR)** [REP1-097] prepared by MVDC, together with Surrey County Council, Reigate and Banstead Borough Council and Tandridge District Council, in that this document identifies and responds to local policies referenced in the **Joint Surrey Councils LIR**.

1.1.5 In line with the **Joint Surrey Councils LIR** [REP1-097], the policy documents considered by this note comprise:

#### Adopted Development Plan documents<sup>1</sup>

- Mole Valley Local Plan 2000 (Saved Policies)
- Mole Valley Core Strategy 2009

#### Emerging Development Plan documents

- Future Mole Valley (Local Plan 2020-2039): Main Modifications consultation, 1 March – 23 April 2024

1.1.6 The planning policy designations that apply to land with the Project's Order Limits that fall within MVDC administrative boundary are identified on the **Planning Policy Plan** contained in **Planning Statement Appendix B** (Doc Ref. 7.1).

1.1.7 The extent of works proposed by the Project within the administrative area of MVDC relate to surface access works and active travel improvements at Longbridge Roundabout, together with Longbridge Roundabout (Church Meadows) replacement open space to the west of the River Mole. In accordance with MVDC's adopted Proposals Map<sup>2</sup>, the existing Longbridge Roundabout is within the boundary of Hookwood defined as a 'Larger Rural Village'; and Brighton Road and the proposed replacement open space is within the Metropolitan Green Belt.

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<sup>1</sup> The Dorking Area Action Plan (2011) also forms part of MVDC's adopted Development Plan but is not of relevance to the Project. This is also confirmed by the **Joint Surrey Councils Local Impact Report** [REP1-097] in that no reference is made to the Area Action Plan other than to confirm its existence as part of the adopted MVDC Development Plan.

<sup>2</sup> <https://www.planvu.co.uk/mvdc/index.php?map=proposals>

Mole Valley Local Plan 2000 (Saved Policies)		
Policy Reference	Policy Description	Compliance Commentary
<b>Protecting the Environment</b>		
Policy ENV3: Development in the Countryside beyond the Green Belt	<p>In the rural areas not covered by the Green Belt, and outside the area of Ockley defined in accordance with Policy RUD3, the countryside will be protected for its own sake, and development adversely affecting its open character will not be permitted.</p> <p>Development within the countryside beyond the Green Belt will only be acceptable for the reasonable needs of agriculture, and forestry or comprises essential facilities for outdoor sport and outdoor recreation, mineral extraction and waste disposal. Small scale development to diversify the rural economy may be permitted under Policies RUD17 and RUD19. Other development in the countryside beyond the Green Belt including the extension and replacement of dwellings, the extension and redevelopment of industrial and commercial premises and other development appropriate to the countryside may be acceptable provided the relevant policies in the Plan are satisfied. All development must be appropriate in scale, form, impact and siting.</p>	<p>Policy ENV3 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 6.18) as forming part of the policy context for the Project.</p> <p>The works proposed by the Project within MVDC’s jurisdiction do not fall within the areas designated as ‘Countryside beyond the Metropolitan Green Belt’, as shown on MVDC’s Proposals Map<sup>3</sup>. As such, the Applicant does not consider Policy ENV3 to be relevant to the Project.</p>

<sup>3</sup> <https://www.planvu.co.uk/mvdc/index.php?map=proposals>

<p><b>Policy ENV4: Landscape Character</b></p>	<p>The Council will seek to ensure that development proposals and forestry schemes in the countryside and rural settlements conserve and will not detract from the character of the local landscape. In determining planning applications account will be taken of the visual impact of the proposed development on the landscape, the extent to which the impact of new buildings has been softened and integrated into the landscape by careful consideration of siting, design, colour and associated planting and whether any existing landscape features such as trees and hedgerows should be retained.</p>	<p>Policy ENV4 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 6.19) as forming part of the policy context for the Project.</p> <p>The policy is applicable to the Project in relation to the works proposed to the existing Longbridge Roundabout, being within the ‘Larger Rural Villages’ boundary of Hookwood. These works comprise surface access and active travel measures to the existing highway infrastructure. The design of these works has been developed through the alternatives assessment process (detailed in <b>ES Chapter 3</b> [<a href="#">APP-028</a>]) including an appraisal of options that would impact on landscape character or harms to visual. The design has also been informed by the appropriate guidelines, including the Design Manual for Roads and Bridges. <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>] provides an assessment of the visual impact of the Longbridge Roundabout proposed works on the surrounding character, informed by representative viewpoints including those of Longbridge</p>
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		<p>Roundabout (contained in <b>ES Figures 8.4.24 and 8.9.73 to 8.9.76</b> [APP-060 to APP-062]). The assessment identifies that vegetation removal required to facilitate the works would open up views of Longbridge Roundabout and moving traffic, and to the existing petrol stations on the roundabout and on Brighton Road. Preliminary Tree Removal and Protection Plans at Longbridge Roundabout are contained in <b>Appendix A of ES Appendix 5.3.2, Annex 6: Outline Arboricultural Method Statement – Part 1</b> [<a href="#">REP1-023</a>].</p> <p>Mitigation includes new landscape planting treatments to integrate the improved highway infrastructure with its surroundings. Illustrative landscape planting proposals have been developed for the highway improvements at Longbridge Roundabout, contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (LEMP)</b> (Doc Ref. 5.3) and which would be developed for approval through the detailed LEMPs in line with the <b>Draft DCO</b> [<a href="#">REP1-004</a>]. The proposals seek to reinstate predominantly</p>
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		<p>native woodland and scrub vegetation that would need to be removed to undertake the works, both within the centre of the roundabout and surrounding it.</p> <p>The design of the highway improvement works to Longbridge Roundabout comply with Policy ENV4 by having considered the landscape and visual impacts at the outset of the scheme design. The appearance will be softened and integrated into the landscape through the provision of new and replacement planting secured through the oLEMP.</p>
<p><b>Policy ENV8: The River Mole, The Tilling Bourne and The Pipp Brook</b></p>	<p>Development which would have a significant or adverse effect on fisheries, the nature conservation, landscape and recreational value of the River Mole, the Tilling Bourne, the Pipp Brook and other areas of open water will not be permitted.</p>	<p>Policy ENV8 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 6.20 and 7.17, and table on pages 78 and 80) as forming part of the policy context for the Project.</p> <p>Policy ENV8 is applicable in respect of the River Mole, which follows the northern boundary of MVDC’s jurisdiction and a section of which is within the Project boundary.</p>

		<p>The ES provides an assessment of existing water bodies and their ecological status through <b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>] and <b>ES Appendix 11.9.2: Water Framework Directive Compliance Assessment</b> [<a href="#">APP-143</a>] and the Project’s potential effects on nature conservation and recreational resources in <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] and <b>ES Chapter 19: Agricultural Land Use and Recreation</b> [<a href="#">APP-044</a>] respectively.</p> <p>There would be minor adverse effects on the River Mole associated with construction of the surface access improvements at Longbridge Roundabout. With the provision of mitigation and best practice measures secured in the <b>Design Principles</b> (Doc Ref. 7.3) and <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> (Doc Ref. 5.3) as a secured through the <b>Draft DCO</b> [<a href="#">REP1-004</a>], these effects are not assessed to be environmentally significant.</p>
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		<p>As a result, the Project does not conflict with Policy ENV8.</p> <p>In other parts of the Project, the River Mole is to be diverted to increase the length of the watercourse and the riparian habitat along it. The sinuosity would allow for the development of natural hydromorphological features creating a wider range of ecological habitats for fish, macroinvertebrates and macrophytes.</p>
<p><b>Policy ENV11: Local and Non-Statutory Nature Reserves</b></p>	<p>Development within or which would have a significant adverse effect on designated Local and Non-Statutory Nature Reserves will not be permitted unless it can be demonstrated to the satisfaction of the Council that there are reasons for the proposal which clearly outweigh the need to safeguard the intrinsic nature conservation value of the site. The Council will support the establishment of local nature reserves if it considers the necessary criteria are met.</p>	<p>Policy ENV11 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (para 7.18) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 9 Ecology and Nature Conservation</b> <a href="#">[APP-043]</a> provides an assessment of the Project's effects on local nature reserves and non-statutory designated sites. The designated sites within the search areas are set out in <b>ES Appendix 9.6.1: Ecological Desk Study</b> <a href="#">[APP-123]</a> and <b>Section 9.6 of ES Chapter 9</b> <a href="#">[APP-043]</a>.</p>

		<p>The Project would not effect local or non-statutory nature reserves due to the mitigation measures that would be put in place, described in <b>Section 9.8 of ES Chapter 9</b> <a href="#">[APP-043]</a>. These measures have also been informed by baseline surveys, including <b>ES Appendix 9.6.2: Ecology Survey Report</b> [APP-124 to APP-130].</p> <p>As such, the Project does not conflict with Policy ENV11.</p>
<p><b>Policy ENV12: Sites of Nature Conservation Importance and Potential Sites of Nature Conservation Importance</b></p>	<p>Development and land use change likely to have an adverse effect on a Site of Nature Conservation Importance identified on the Proposals Map will not be permitted unless it can be clearly demonstrated that there are reasons for the proposal which outweigh the need to safeguard the nature conservation value of the site. In all cases where development or land use change is permitted which would damage the nature conservation value of the site, such damage will be kept to a minimum. Where appropriate, the Council will consider the use of conditions and/or planning obligations to provide appropriate suitable measures.</p> <p>In considering development proposals and land use change that are likely to have a significant effect on the integrity of a</p>	<p>Policy ENV12 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (para 7.19) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 9 Ecology and Nature Conservation</b> <a href="#">[APP-043]</a> provides an assessment of the Project’s effects on designated Sites of Nature Conservation Importance. The designated sites within the search areas and falling with MVDC’s administrative area are set out in <b>ES Appendix 9.6.1: Ecological Desk Study</b></p>

	<p>potential Site of Nature Conservation Importance identified on the Proposals Map, the Council will consult and have regard to the views of the Surrey Wildlife Trust on the impact of the proposal and any nature conservation value of the site.</p>	<p><a href="#">[APP-123]</a> and <b>Section 9.6 of ES Chapter 9</b> <a href="#">[APP-043]</a>.</p> <p>The highway improvements to Longbridge Roundabout would result in works being undertaken within 150m of Withy Gill SNCI, within MVDC's jurisdiction. The SNCI would be separated from construction works by agricultural land and no direct habitat loss would occur. The risk of pollution incidents occurring as a result of the Project would be mitigated through the use of pollution control measures, through <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a>, and therefore the impact would be negligible and not significant. Further to this, new planting is proposed to the north-east of Longbridge Roundabout as part of the delivery of new open space which will further enhance the area and the context to the Withy Gill SNCI.</p> <p>The remaining non-statutory designated sites within MVDC's jurisdiction are more than 600 metres from the Project and therefore less sensitive to effects from</p>
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		<p>construction. There would also be no new or continuing operational effects on the SNCIs in MVDC’s jurisdiction. As such, the Project does not conflict with Policy ENV12.</p>
<p><b>Policy ENV13: Features of Local Importance for Nature Conservation</b></p>	<p>The Council will seek to safeguard sites and features of nature conservation importance that are not identified on the Proposals Map but which contribute to the natural heritage of the District. The development of such features will not be permitted unless either:</p> <ol style="list-style-type: none"> <li>1. the development would not significantly and adversely affect the features or</li> <li>2. the features will be protected from harm or transferred to another habitat or</li> <li>3. the importance of the development outweighs the nature conservation value of the features.</li> </ol>	<p>Policies ENV13 and ENV14 are listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 7.20 and the table on page 80) as forming part of the policy context for the Project. The policies are described in the LIR as working in tandem and therefore are considered together.</p> <p><b>ES Chapter 9 Ecology and Nature Conservation</b> [<a href="#">APP-043</a>] provides an assessment of the Project’s effects on ecology and nature conservation. The assessment has been informed by relevant baseline data which has been collected to determine ecological features of concern. These are reported in Section 9.6 of the <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-043</a>] and contained in <b>ES Appendix 9.6.1: Ecological Desk Study</b> [<a href="#">APP-123</a>], <b>ES</b></p>
<p><b>Policy ENV14: Enhancement, Management and Creation of Nature Conservation Features</b></p>	<p>In considering development proposals account will be taken of any measures relevant to the proposals concerned to protect or enhance existing nature conservation features and scope to create and manage new areas of nature conservation value.</p>	

		<p><b>Appendix 9.6.2: Ecology Survey Report Parts 1 to 7</b> [APP-124 to APP-130], <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys Parts 1 and 2</b> [<a href="#">APP-131</a> and <a href="#">APP-132</a>] and <b>ES Appendix 9.6.4 Confidential Badger Survey</b> [<a href="#">APP-133</a>].</p> <p>Priority habitats and species have been identified as Important Ecological Features in Table 9.6.2 of <b>ES Chapter 9</b> and any potential effects on them are described in Section 9.9. Opportunities to avoid effects on features and habitats have been taken during the site selection process, and enhancement and mitigation measures have been included in the design of the Project in accordance with Policy ENV14, as set out in Section 9.8 of <b>ES Chapter 9</b>.</p> <p>Overall, the effects on habitats and species are found to be not significant. The Project would require the removal of species-poor hedgerow, including around Longbridge Roundabout, and the significant effects on the adverse impact from the loss would not be mitigated until</p>
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		<p>the new and replacement planting is delivered through the detailed LEMPs. Additional hedgerow planting would be undertaken early in the construction period on parts of the wider Project, as detailed within <b>ES Appendix 8.8.1: Outline LEMP</b> (Doc Ref. 5.3) which would enhance habitat connectivity in these areas to provide a moderate beneficial effects in the longer term. Habitat creation would also be monitored to determine its success and to inform whether any remediation works were required. The relevant LEMPs would detail the frequency of monitoring and include mechanisms to allow for alterations to be made to ensure habitat creation was successful.</p> <p>Overall, the Project therefore accords with Policy ENV13.</p>
<p>Policy ENV15: Species Protection</p>	<p>Where it is evident that a proposed development would be likely to result in harm to a protected species or its habitat, a thorough site investigation will be necessary by the applicant and the relevant nature conservation bodies will be consulted. Development that would materially harm a protected species or its habitat will not be permitted.</p>	<p>Policy ENV15 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 7.21) as forming part of the policy context for the Project.</p>

		<p><b>ES Chapter 9: Ecology and Nature Conservation</b> [APP-034] assesses the effects of the Project on protected species and habitats, informed by site-specific surveys described in <b>Section 9.4</b> and reported in <b>ES Appendix 9.6.2 Ecology Survey Report Parts 1 to 7</b> [APP-123 to APP-130] carried out in accordance with Policy ENV15.</p> <p>A number of measures are incorporated into the Project to reduce the potential for impacts on ecology and nature conservation, and to ensure that any localised impacts on habitats for protected species would be avoided. These measures are described in Section 9.8 of <b>ES Chapter 9</b>. Overall, there would not be a significant adverse impact on protected species as a result of the mitigation measures and therefore the Project is in accordance with Policy ENV15.</p> <p>Pre-construction surveys will be carried out to identify any protected species within the area and which will inform any necessary applications for protected</p>
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		<p>species licences and any method statements which are required to be complied with during the construction of the Project. These licences are set out in the <b>List of Other Consents and Licences</b> <a href="#">[APP-264]</a> and will be applied for separately outside of the DCO Application before certain activities can be carried out.</p>
<p><b>Policy ENV23: Respect for Setting</b></p>	<p>Development will normally be permitted where it respects its setting taking account of the following:</p> <ol style="list-style-type: none"> <li>1. the scale, character, bulk, proportions and materials of the surrounding built environment. Developments will not be permitted where it is considered they would constitute over-development of the site by reason of scale, height or bulk or in relation to the boundaries of the site and/or surrounding developments;</li> <li>2. public views warranting protection. Opportunities will be sought to create attractive new views or vistas;</li> <li>3. townscape features such as street patterns, familiar landmark buildings, and the space about buildings;</li> <li>4. the roofscape. Pitched roofs will normally be expected and any plant, machinery or lifts being incorporated within the roof structure;</li> </ol>	<p>Policy ENV23 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (para 6.21) as forming part of the policy context for the Project.</p> <p>The Project proposals within MVDC’s jurisdiction comply with Part 1 of Policy ENV23, in that the scheme comprises improvements to the existing Longbridge Roundabout and additional open space provisions, and therefore are not considered to be over-development of the site or area.</p> <p>In respect of Part 2, the landscaping principles and concept design for the Church Meadows replacement open space</p>



	<p>5. the impact of the development within or conspicuous from the Green Belt on the rural amenities of the Green Belt by reason of its siting, materials or design;</p> <p>6. the impact on the landscape of the proposed siting and appearance of new agricultural buildings or works or any other appropriate/exceptional development in the countryside.</p>	<p>is contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, which will be developed through detailed Landscape and Ecology Management Plan for approval in line with Requirement 8 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>. The objectives for Zone 7 (Surface Access Corridor) include softening the site boundaries, having clear lines of sight, providing a transition to the countryside and visual screening. These objectives are considered to be in line with Policy ENV23 Part 2 whilst also balancing the need to provide visual screening of the highway infrastructure to the wider area.</p> <p>Parts 3, 4 and 6 of Policy ENV23 are not considered to be applicable to the Project proposals falling within MVDC's jurisdiction, described in Section 1 of this document.</p> <p>In respect of Part 5, the relationship of the Project to the Metropolitan Green Belt is addressed in commentary against Draft Policy EN1.</p>
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<p>Policy ENV39: Development in Conservation Areas</p>	<p>Development in Conservation Areas, or adjacent to and affecting their setting, shall preserve or enhance the character and appearance of the Area. Within this context:</p> <ol style="list-style-type: none"> <li>1. developments, including extensions, shall be of a high standard of design and well detailed such as to reflect the local historic character, scale, quality of buildings, settlement form, and materials;</li> <li>2. features which contribute to local character, including significant spaces, trees, walls and traditional architectural details, shall be retained;</li> <li>3. the design of spaces between buildings, and their surfacing shall be sensitively treated;</li> <li>4. significant views into and out of Conservation Areas will be safeguarded. To demonstrate that the above requirements have been satisfied, detailed rather than outline planning applications will normally be expected. The rigorous application of general planning and highway policies may be relaxed where they would be in conflict with the preservation or enhancement of the Area's character or appearance.</li> </ol>	<p>Policy ENV39 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (para 5.14) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> and Section 8.14 of the <b>Planning Statement</b> <a href="#">[APP-245]</a> form part of the documentation for the application that consider heritage assets.</p> <p>A study of Conservation Areas is included within <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a>. There is one Conservation Area partially within the Project site boundary, namely Church Road (Horley) Conservation Area, on the southwestern edge of Horley and in MVDC's administrative area.</p> <p>Paragraph 7.3.18 of <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> considers the impact of the proposed environmental mitigation land to the north-east of Longbridge Roundabout on the Church Road (Horley) Conservation Area.</p>
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		<p>Subject to appropriate mitigation (comprising vegetation retention, proposed woodland and tree planting, proposed earth shaping, embankments, cuttings or bunds, proposed fences, walls or barriers and measures designed to reduce noise), as secured through <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a> and <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, the assessment concludes that the impact of the proposed planting scheme, the provision of a new River Mole footbridge and the installation of information boards is likely to result in an effect of minor beneficial significance.</p> <p><b>Historic England’s Written Representations</b> <a href="#">[REP1-073]</a> also confirms that it does not consider that <i>“the highway changes at Longbridge Roundabout and the proposed widening of the A23 bridge over the River Mole, are unlikely to result in significant harm to the setting of the Church Road, Horley Conservation Area”</i>.</p>
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		There are also no outstanding matters between the Applicant and MVDC on historic environment matters as confirmed in the <b>Statement of Common Ground between the Applicant and MVDC</b> [ <a href="#">REP1-043</a> ] submitted at Deadline 1.
Policy ENV42: Preservation and Restoration of Listed Buildings	<p>There will be a presumption in favour of the preservation of Listed Buildings. Planning standards or other planning policies may be relaxed where they would otherwise prejudice the preservation of Listed Buildings. If the continuation of the original use is impractical an appropriate change of use which would preserve or restore the building will be considered favourably provided that the associated works or use would not:</p> <ol style="list-style-type: none"> <li>1. detract from the special character or appearance of the building or its setting;</li> <li>2. damage, remove or conceal any internal or external architectural or historic features of the building.</li> </ol>	Policy ENV42 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [ <a href="#">REP1-097</a> ] (para 5.14) as forming part of the policy context for the Project. However, the Applicant does not consider Policy ENV42 to be of relevance to the Project given it does not entail works to Listed Buildings.
Policy ENV43: Alterations and Additions to Listed Buildings	<p>Alterations and additions to the external or internal fabric or setting of a Listed Building will normally be permitted provided that:</p> <ol style="list-style-type: none"> <li>1. the proposal preserves the original architecture, scale, materials, colour, detailing and other significant</li> </ol>	Policy ENV43 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [ <a href="#">REP1-097</a> ] (para 5.14) as forming part of the policy context for the Project.

	<p>architectural or historic features of the building concerned and</p> <p>2. the proposal does not detract from the character or setting of the building.</p>	<p>The Applicant does not consider the first element of Policy ENV43 to be of relevance to the Project given it does not propose alterations or additions to a Listed Building.</p> <p><b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> provides an assessment of the Project’s impacts on the setting of Listed Building(s). The assessment identifies that the Project proposals within MVDC’s jurisdiction would not result in an adverse impact on the setting of Mole Valley’s listed buildings.</p> <p>The <b>Statement of Common Ground between the Applicant and Historic England (HE)</b> <a href="#">[REP1-035]</a> confirms that HE broadly agrees with the output of the ES Chapter 7 assessment. There are also no outstanding matters between the Applicant and MVDC on historic environment matters as confirmed in the <b>Statement of Common Ground between the Applicant and MVDC</b> <a href="#">[REP1-043]</a> submitted at Deadline 1, notably MVDC has confirmed it is ‘no longer pursuing’</p>
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		<p>matters relating to the historic environment based on HE’s response.</p>
<p><b>Policy ENV49: Areas of High Archaeological Potential</b></p>	<p>Where significant development proposals fall within an Area of High Archaeological Potential the developer will be required to provide an initial assessment of the archaeological value of the site preferably before, or otherwise as part of, any planning application.</p> <p>If as a result of that assessment important archaeological remains are considered to exist:</p> <ol style="list-style-type: none"> <li>1. the developer may be required to arrange for an archaeological field survey to be carried out before the determination of the planning application and</li> <li>2. where important archaeological remains are found to exist and can justifiably be left in situ, provision will be made by planning condition or agreement to minimise or avoid damage to the remains.</li> </ol> <p>Alternatively, where there is good reason to believe archaeological remains exist but preservation of known remains in situ is not justified, a planning condition will normally be imposed requiring a programme of archaeological work in accordance with a scheme approved by the Council to take place before any development commences and the results</p>	<p>Policy ENV49 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 5.14) as forming part of the policy context for the Project.</p> <p>The Project proposals within MVDC’s jurisdiction do not fall within an Area of High Archaeological Potential. As such, Policy ENV49 is not relevant to the Project.</p> <p>Notwithstanding this, a full archaeological assessment has been provided in <b>ES Appendix 7.6.2: Archaeological Evaluation Report</b> [<a href="#">APP-102</a>], <b>ES Appendix 7.6.3: Archaeological Evaluation Report Phase 2 - Longbridge Roundabout and Reigate Field</b> [<a href="#">APP-103</a>] and <b>ES Appendix 7.6.4: Geotechnical Data Review</b> [<a href="#">APP-104</a>]. The application is also accompanied by a Written Scheme of Investigation for Surrey, contained in <b>ES Appendix 7.8.1: Written Scheme of Investigation for</b></p>

	<p>and any finds should be published and made available for public display.</p>	<p><b>Surrey</b> [<a href="#">APP-105</a>]. The land within the Project boundary falling in MVDC's administrative area is not identified as necessary for further archaeological investigations, as justified within the Surrey WSI.</p> <p>There are also no outstanding matters between the Applicant and MVDC on historic environment matters as confirmed in the <b>Statement of Common Ground between the Applicant and MVDC</b> [<a href="#">REP1-043</a>] submitted at Deadline 1.</p>
<p>Policy ENV56: Housing Development Affected by Noise</p>	<p>In considering proposals for housing development near a source of noise, the Council will consider into which of the four noise exposure categories the proposed site falls taking into account both day and night time noise levels.</p> <p>Noise considerations will be taken into account when determining planning applications for housing development in sites in Noise Exposure Category B and, where appropriate, conditions will be imposed to ensure an adequate level of protection against noise.</p> <p>Planning permission will not normally be granted for development of sites in Noise Category C unless</p>	<p>Policy ENV56 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 3.19 and 12.45) as forming part of the local policy context for the Project. However, the Project does not propose new residential development and therefore Policy ENV56 is not of relevance to the Project. Notably, para 12.45 of the Joint Surrey Councils LIR describes the policy as been applicable to "<i>planning applications for housing</i>".</p>

	<p>exceptionally there are very special circumstances to justify development.</p> <p>Planning permission will normally be refused for development on sites in Noise Exposure Category D.</p>	
<p>Policy ENV60: Renewable Energy Projects</p>	<p>In considering proposals for renewable energy installations in the built-up areas, the villages identified in Policies RUD1, RUD2 and RUD3, and the countryside beyond the Green Belt, the Council will have regard to:</p> <ol style="list-style-type: none"> <li>1. the visual impact of the development on the character and appearance of the surrounding area;</li> <li>2. the effect of the proposal on the amenities of any existing nearby properties;</li> <li>3. the volume and nature of traffic generated by the development and its effect on highway safety and environmental character of the local road network;</li> <li>4. whether the resource can only be harnessed where it occurs;</li> <li>5. the contribution to reducing emissions of greenhouse gases.</li> </ol> <p>Proposals in the Green Belt will be considered in the light of the presumption against inappropriate development in these areas.</p>	<p>Policy ENV60 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 13.15) as forming part of the local policy context for the Project. However, the Project proposals within MVDC’s jurisdiction does not relate to new renewable energy installations and therefore Policy ENV60 is not of relevance to the Project.</p>



	Particular care will be taken in assessing proposals in the Surrey Hills Area of Outstanding Natural Beauty, where the conservation of the natural beauty of the landscape will be the primary consideration, and other environmentally sensitive areas.	
<b>Policy ENV65: Drainage</b>	Development will normally be permitted where foul sewers and sewage treatment works of adequate capacity and design are available or will be provided in time to serve the development.	Policy ENV65 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [ <a href="#">REP1-097</a> ] (para 9.14) as forming part of the local policy context for the Project. However, the Project proposals within MVDC’s jurisdiction do not generate increased wastewater flows and therefore does not relate to the capacity of foul sewers. Policy ENV65 is therefore not of relevance to the Project.
<b>Policy ENV67: Groundwater Quality</b>	Development will not be permitted which in the opinion of the Council, after consultation with the Environment Agency, may have an adverse impact on the quality of groundwater.	Policy ENV67 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [ <a href="#">REP1-097</a> ] (para 9.14) as forming part of the policy context for the Project.  <b>ES Chapter 11: Water Environment</b> [ <a href="#">APP-036</a> ] provides an assessment of the Project’s effects on groundwater quality, supported by a Groundwater Assessment in <b>ES Appendix 11.9.5</b> [ <a href="#">APP-146</a> ].

		<p>The <b>Statement of Common Ground between GAL and Environment Agency</b> <a href="#">[REP1-034]</a> sets out the agreed position on the water environment, including groundwater. This confirms that the EA has no outstanding concerns in relation to groundwater quality. There are also no concerns on groundwater quality reported in the <b>Statement of Common Ground between GAL and MVDC</b> <a href="#">[REP1-043]</a> submitted at Deadline 1.</p> <p>On this basis, the Project does not conflict with Policy ENV67.</p>
<p><b>Policy ENV68: Adequate Water Resources</b></p>	<p>Development will only be permitted where the Council, after consultation with the Environment Agency and the relevant water supply companies, considers that adequate water resources are available, or where their provision is not considered detrimental to existing abstractions, river flows, water quality, fisheries, amenity or nature conservation.</p>	<p>Policy ENV68 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (para 9.14) as forming part of the local policy context for the Project. However, the Project proposals within MVDC’s jurisdiction do not require a water supply and therefore Policy ENV68 is not of relevance to the Project.</p>

**Development in Rural Areas**

<p>Policy RUD28: Off-Airport Car Parking</p>	<p>New off-airport car parking sites, or extensions to existing sites, will not be permitted.</p> <p>Enforcement action will be taken against any unauthorised off-airport parking which in the opinion of the Council is inappropriately sited having regard to the policies of this Plan and any other material considerations.</p>	<p>Policy RUD28 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 3.18, 10.30 and 10.121) as forming part of the local policy context for the Project. However, the Project proposals within MVDC’s jurisdiction do not relate to car parking proposals and therefore Policy RUD28 is not of relevance to the Project.</p>
<b>Employment</b>		
<p>Policy E1: Existing Industrial and Commercial Land Uses</p>	<p>The maintenance and renewal of Mole Valley's economy will be met primarily by encouraging the re-use of suitably located land in built-up areas already in industrial and commercial use by normally permitting development for:</p> <ol style="list-style-type: none"> <li>1. the expansion needs of an existing firm where it can be satisfactorily accommodated within the existing premises or on immediately adjacent urban land, or</li> <li>2. changes of use to other industrial and commercial uses (Class B1-B8 of the Use Classes Order 1987), subject to the provisions in Policy E4 below, or</li> <li>3. the redevelopment of suitably located existing industrial and commercial premises, provided that any resulting new or intensified use can be accommodated in relation to the environmental,</li> </ol>	<p>Policy E1 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.29) as forming part of the local policy context for the Project. However, the Project proposals do not relate to the development of existing industrial or commercial land uses within MVDC’s jurisdiction. As such, Policy E1 is not of relevance to the Project.</p>

	infrastructure and other development provision policies of the Plan	
<p><b>Policy E2:</b> Safeguarding Existing Industrial and Commercial Land</p>	<p>The loss of existing suitably located industrial and commercial land in built-up areas to other uses will not be permitted unless its retention for industrial and/or commercial use has been fully explored without success. Suitably located larger industrial and commercial sites are identified on the Proposals Map.</p> <p>Smaller sites will be regarded as being suitably located where:</p> <ol style="list-style-type: none"> <li>1. they are located on parts of the highway network where traffic can be satisfactorily absorbed;</li> <li>2. they are in a location which is convenient for public transport;</li> <li>3. existing or proposed development would not significantly harm the character of the area;</li> <li>4. existing or proposed development would not significantly harm the amenities of nearby residents</li> </ol>	<p>Policy E2 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.30) as forming part of the local policy context for the Project. However, the Project proposals do not result in the loss of existing industrial and commercial land uses in MVDC's jurisdiction. As such, Policy E2 is not of relevance to the Project.</p>
<p><b>Policy E4:</b> Redevelopment of Sites for Industrial and Storage or Distribution Uses</p>	<p>In considering proposals for the redevelopment of the following sites as indicated on the Proposals Map, the Council will give particular encouragement to the provision of accommodation suitable for light industrial and general industrial uses, and storage and distribution uses, provided they can be accommodated in relation to the environmental, infrastructure and other policies in the Plan.</p>	<p>Policy E4 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.31) as forming part of the local policy context for the Project. However, the Project does not relate to the redevelopment of the identified sites in</p>

	<p>Leatherhead:</p> <ol style="list-style-type: none"> <li>1. Barnett Wood Lane Industrial Area</li> <li>2. Plough Industrial Estate</li> </ol> <p>Dorking:</p> <ol style="list-style-type: none"> <li>1. Land at Curtis Road/Station Road</li> <li>2. Land at Vincent Lane</li> </ol>	<p>Policy E4 and therefore the policy is not of relevance to the Project.</p>
<p>Policy E6: Sites for Small Firms</p>	<p>The Council will encourage the redevelopment of suitably located industrial and commercial land, as identified in Policy E2, to include provision of premises suitable for occupation by small firms.</p> <p>In order to retain a supply of premises suitable for small firms, the loss of sites providing such accommodation on suitably located industrial and commercial land will not normally be permitted</p>	<p>Policy E6 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.32) as forming part of the local policy context for the Project. However, the Project proposals do not relate to the redevelopment of industrial or commercial land uses for occupation by small firms within MVDC’s jurisdiction. As such, Policy E6 is not of relevance to the Project.</p>
<p><b>Movement</b></p>		
<p>Policy MOV2: The Movement Implications of Development</p>	<p>Development will normally only be permitted where it can be demonstrated that it is or can be made compatible with the transport infrastructure and the environmental character in the area, having regard to all forms of traffic generated by that development. Where appropriate developers will be expected to provide for, or contribute to, transportation</p>	<p>Policy MOV2 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 10.28 and 17.8 and table on pages 152 to 159) as forming part of the policy context for the Project.</p>

initiatives or highway works that should provide adequate capacity to at least the end of the Plan period. In particular, proposals for major developments will only be permitted where it can be demonstrated that in order to accommodate the traffic generated by that development appropriate measures are made to obviate the environmental impact, and there is appropriate provision for:

1. off-street vehicular parking, and
2. suitable servicing arrangements, and
3. vehicular access and egress and movement within the site, and
4. capacity on the transport network and in the vicinity of the development, and
5. access and egress to be obtained, or improved, to and from the primary route and distributor road networks, and
6. public transport services, and
7. pedestrians and cyclists, and
8. people with disabilities.

Where a particular part of the highway network already endures high traffic flows significantly above its operational and environmental capacity, then only small-scale development or redevelopment, which leads to little or no new traffic generation, will be permitted. The cumulative effects of existing and committed development on the

The design of the surface access and active travel works at Longbridge Roundabout, within MVDC’s jurisdiction, are presented and described in the **Surface Access Highways Plan: General Arrangements** [\[APP-020\]](#), **Surface Access Highways Plans: Engineering Section Drawings** [\[APP-021\]](#), **Surface Highways Plans Structure Section Drawings** [\[APP-022\]](#), and the **ES Chapter 19: Agricultural Land Use and Recreation Figures** [\[APP-044\]](#).

The surface access works are proposed to provide mitigation for the increased volumes of traffic on roads in the locality and result in an acceptable impact on the transport network. The works within MVDC’s administrative area comprise improvement works and are not applicable to items 1, 2, 3 and 5 listed in Policy MOV2. The surface access works are part of a wider package of proposed highway interventions that are outside MVDC’s area, with accompanying surface access obligations in the **Draft Section 106 Agreement** [\[REP2-004\]](#).

	<p>operational capacity and environmental character of congested areas as a whole will be taken into account in the determination of development proposals. The provision of new accesses onto principal traffic routes will not normally be permitted where access can only be gained from those networks.</p>	<p>The <b>Transport Assessment</b> <a href="#">[AS-079]</a> provides an assessment of the Project's implications on the highway network's capacity and taking account of a comprehensive set of cumulative development assumptions related to specific developments (described in Chapter 12). This assessment approach is in line with Policy MOV2.</p> <p>The application is also accompanied by <b>Surface Access Commitments</b> <a href="#">[APP-090]</a> which the Applicant is committed to achieving in relation to surface access at the Airport as part of the Project and its wider package of surface access interventions, beyond MVDC's jurisdiction. The SACs include commitments in relation to bus and coach services, sustainable transport initiatives, on-site active travel measures and measures to discourage single-occupancy private vehicles, in compliance with items 4, 6, 7 and 8 of Policy MOV2.</p>
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		<p>Commentary on the proposed works and the relationship to the surrounding environmental character of the area is provided against Policy ENV4.</p> <p>On this basis, the Project complies with Policy MOV2.</p>
<p><b>Policy MOV5: Parking Standards</b></p>	<p>The County Council's current car parking standards will be applied as maxima and having regard to:</p> <ol style="list-style-type: none"> <li>1. the developer's own requirements, subject to road safety or traffic management implications, and</li> <li>2. the accessibility of the location to means of travel other than the private car, and</li> <li>3. the possibility of payments in lieu of car parking spaces being made to assist in public transport provision and in facilities for pedestrians and cyclists.</li> </ol>	<p>Policy MOV5 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 10.29) as forming part of the local policy context for the Project. However, the Project proposals within MVDC's jurisdiction do not relate to car parking provisions and therefore Policy MOV5 is not of relevance to the Project.</p>
<p><b>Policy MOV13: The Railway Network and Interchange Facilities</b></p>	<p>In conjunction with Surrey County Council, Railtrack and train operating companies, the Council will encourage the retention and enhancement of rail services and will support improvements to existing, and the provision of new interchange facilities and better use of station car parks as well as secure cycle parking. Any proposals resulting in the loss of station car parking will be strongly resisted unless the need for it no longer exists and is unlikely to be required in</p>	<p>Policy MOV13 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 10.29) as forming part of the local policy context for the Project. However, the Project proposals within MVDC's jurisdiction do not relate to rail service provisions, cycle parking or the</p>



	the foreseeable future, or suitable alternative provision is made for it.	loss of station car parking. Policy MOV13 is therefore not relevant to the Project.
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<b>Mole Valley Core Strategy 2009</b>		
<b>Policy Reference</b>	<b>Policy Description</b>	<b>Compliance Commentary</b>
<b>What the Strategy will deliver</b>		
Policy CS12: Sustainable Economic Development	<p>The sustainable growth of the District's economy will be supported through the provision of a flexible supply of land to meet the varying needs of the economic sectors by:</p> <ol style="list-style-type: none"> <li>1. Safeguarding and recycling accessible and well located industrial and commercial sites which will be identified through the Development Management Development Plan Document.</li> <li>2. Encouraging, where appropriate, mixed use development.</li> <li>3. Supporting development which maintains and enhances Leatherhead's role as a desirable location for knowledge based companies.</li> </ol>	<p>Policy CS12 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.34) as forming part of the policy context for the Project.</p> <p>In respect of part 6 of Policy CS12, the application is supported by <b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> [<a href="#">APP-198</a>]. The strategy sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from the Project and will ensure the local area benefits from new employment</p>

	<ol style="list-style-type: none"> <li>4. Supporting development which maintains and enhances Dorking's role as a town with a strong service sector.</li> <li>5. Supporting a diverse and sustainable rural economy in accordance with Planning Policy Statement 7 - 'Sustainable Development in Rural Areas'.</li> <li>6. Working with partners and supporting initiatives and development which assists in improving the skills base of local residents especially in those localities where there is a significant disparity in the skills of residents and the types of local job opportunities available.</li> <li>7. Supporting development of the District's strengths as a knowledge based local economy and encouraging the establishment of new companies especially those at the leading edge of new sectoral employment opportunities such as sustainable development.</li> <li>8. Making provision for accommodation for visitors to the District, especially in Dorking and Leatherhead, both in terms of business trips and tourism related visits.</li> </ol>	<p>opportunities consistent with the policy objective. An <b>ESBS Implementation Plan</b> (Doc Ref. X) is submitted at Deadline 3 providing further detail on how the ESBS measures will be brought forward.</p> <p>The remaining parts of Policy CS12 are not applicable to the Project components with MVDC's administrative area.</p>
<b>Policy CS13: Landscape Character</b>	<ol style="list-style-type: none"> <li>1. All new development must respect and, where appropriate, enhance the character and distinctiveness of the landscape character area in which it is proposed. Landscape enhancement works</li> </ol>	<p>Policy CS13 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 6.16 and table on page 64) as forming part of the policy context for the Project.</p>

	<p>may be required to avoid adverse impacts associated with new developments.</p> <ol style="list-style-type: none"> <li>2. The Surrey Hills Area of Outstanding Natural Beauty (AONB) is of national significance, and as such, the conservation of the natural beauty of the landscape will be a priority in this area. The AONB will be protected in accordance with the objectives in Planning Policy Statement 7 (Sustainable Development in Rural Areas) and the Surrey Hills Management Plan, with particular focus on the impact of development on ridgelines, significant views, peace, tranquillity and levels of artificial light.</li> <li>3. The AGLV (Area of Great Landscape Value) will be retained until such time as there has been a review of the AONB boundary. Development in the AGLV area will be required to be supported by evidence to demonstrate that it would not result in harm to the AONB, particularly views from and into the AONB and the key features identified in point 2 above.</li> <li>4. Small scale development for the reasonable needs of the rural economy, outdoor recreation as well as that for the local community in the AONB or AGLV will be supported subject to meeting other relevant criteria within the LDF.</li> </ol>	<p>The design of the Project has full regard to the local landscape character and has been assessed in <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>], <b>Section 8.15</b> of the <b>Planning Statement</b> [<a href="#">APP-245</a>] and the <b>Design and Access Statement Volumes 1 to 5</b> [APP-253 to APP-257].</p> <p>Whilst significant temporary and permanent (i.e. during construction and operation) adverse effects are likely to occur in respect of the local landscape character of Mole Valley Open Weald; once mitigation planting especially has matured, the Project will contribute to and enhance the natural and local environment.</p> <p>Consistent with part 2 of Policy CS13, the Project has also been assessed in terms of its potential effects upon AONBs including an assessment of effects on the perception of tranquillity within nationally designated landscapes. The assessment is set out within <b>ES Chapter 8:</b></p>
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		<p><b>Townscape, Landscape and Visual Resources</b> [<a href="#">APP-033</a>] and <b>Section 8.15</b> of the <b>Planning Statement</b> [<a href="#">APP-245</a>].</p> <p>The assessment concludes that an increase of up to 20% in overflights compared to the future baseline in 2032 would result in minor adverse effects on perception of tranquility, which is not significant. The Project will therefore not materially affect the positive qualities visitors and nearby residents expect of the AONBs (such as Surrey Hills), including distant scenic views and the landscape’s relative tranquillity and dark skies.</p> <p>Parts 3 and 4 of Policy CS13 are not applicable as the land within the Project boundary falling in MVDC’s administrative area is not within the designated Area of Great Landscape Value.</p>
<p><b>Policy CS14: Townscape, Urban Design and the Historic Environment</b></p>	<p>1. All new development must respect and enhance the character of the area in which it is proposed whilst making the best possible use of the land available. This will be assisted through the work on Built-Up Area Character Appraisals.</p>	<p>Policy CS14 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 5.14) as forming part of the policy context for the Project.</p>

	<ol style="list-style-type: none"> <li>2. The Council will resist development of a poor quality of design and will expect to see sufficient detail set out in the Design and Access Statements, where required, to enable planning applications to be properly determined.</li> <li>3. Development must incorporate appropriate landscaping with particular attention to the use of trees and hedges native to the locality.</li> <li>4. Areas and sites of historic or architectural importance will be protected and, where appropriate enhanced in accordance with the legislation, national and regional guidance.</li> </ol>	<p>In respect of parts 1 and 3 of Policy CS14, commentary is provided against Policy CS13 above.</p> <p>In respect of part 2 of Policy CS14, the application is supported by a comprehensive <b>Design and Access Statement Volumes 1 to 5</b> [APP-253 to APP-257] which contains detailed analysis of the existing site and its surroundings, describes the Project proposals and demonstrates that the Project utilises principles of good design. The Project therefore accords with this part of Policy CS14.</p> <p>In respect of part 4 of Policy CS14, commentary on the historic environment is provided against Policies ENV39 and ENV43 above.</p>
<p><b>Policy CS15: Biodiversity and Geological Conservation</b></p>	<ol style="list-style-type: none"> <li>1. Biodiversity and areas of geological importance will be protected and enhanced in accordance with European and National legislation / guidance including that set out in Planning Policy Statement 9 (Biodiversity and Geological Conservation), the South East Plan Policy NRM5 (Conservation and</li> </ol>	<p>Policy CS15 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 7.22 and 8.8) as forming part of the policy context for the Project.</p>

	<p>Improvement of Biodiversity) and the Surrey Biodiversity Action Plan.</p> <ol style="list-style-type: none"> <li>2. In order to reduce the impact of development on the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), there is a presumption against any increase in residential or employment related development within 800m of the site boundary, unless its impact can be mitigated.</li> <li>3. All water courses, mature hedges and trees within development sites should be, as far as practicable, retained. Only where no realistic alternatives are available or replacement of such features elsewhere in the site would result in biodiversity enhancements above what already exists, will removal of such features be permitted. In these cases the replacement will be expected to result in biodiversity enhancements to what previously existed and where possible should seek to contribute to a network of green infrastructure and the objectives of the Surrey Biodiversity Action Plan.</li> <li>4. Planting and other schemes that promote biodiversity will be expected as part of all development schemes, focusing on native species from the locality and particularly trees, a key feature of the environment across Surrey.</li> </ol>	<p>In respect of part 1 of Policy CS15, commentary on the Project’s impact on biodiversity is provided in <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>]. The assessment reflects the principles of Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services, as summarised in Section 9.13 of <b>ES Chapter 9</b> [<a href="#">APP-034</a>] being the appropriate guidance.</p> <p>Part 2 of Policy CS15 is not applicable, in that the Project is not located in the Special Area of Conservation or within the 800m buffer.</p> <p>With regards to parts 3 and 4 of Policy CS15, the Project’s embedded and good practice mitigation measures are detailed in Section 9.8 of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>], together with detailed ecological mitigation strategies in relation to specific species contained in <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys Parts 1 and 2</b> [<a href="#">APP-131</a> and <a href="#">APP-132</a>] and <b>ES Appendix 9.6.4 Confidential</b></p>
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		<p><b>Badger Survey</b> [<a href="#">APP-133</a>]. Mitigation takes account of tree removal that would be required to facilitate the highway works and includes new landscape planting treatments to integrate the improved highway infrastructure with its surroundings. Illustrative landscape planting proposals have been developed for the highway improvements at Longbridge Roundabout and the Church Meadow replacement open space, contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> (LEMP) (Doc Ref. 5.3) and which would be developed for approval through the detailed LEMPs in line with the <b>Draft DCO</b> [<a href="#">REP1-004</a>]. The landscape principles within the oLEMP focus on reinstating predominantly native woodland and scrub vegetation at Longbridge Roundabout and create new habitats in the Church Meadow replacement open space, comprising woodland, scrub and tree planting and species-rich wet and dry grassland creation.</p>
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<p>Policy CS16: Open Space, Sports and Recreation Facilities</p>	<ol style="list-style-type: none"> <li>1. Open space, sports and recreation facilities will be safeguarded from development. If development of a site is proposed, the scheme will be assessed against Planning Policy Guidance Note 17 (Planning for Open Space, Sports and Recreation). In particular evidence will have to be presented that either the existing use is no longer required and that no other open space, sports or recreation provision is required or appropriate in that area, or that suitable alternative provision can be made.</li> <li>2. To address needs as a result of development:             <ol style="list-style-type: none"> <li>a. developer contributions (in accordance with Policy CS17) will be used to fund improvements to existing sites and facilities in order to allow more intensive use; and</li> <li>b. the provision of appropriate facilities will be required on site as part of any development scheme of around 50 dwellings or more.</li> </ol> </li> <li>3. Where existing deficits in open space, sports and recreation facilities are identified, the Council will explore allocating land for these purposes through the Land Allocations or other appropriate DPD.</li> <li>4. The Council will encourage the provision of new open space, sports and recreation facilities provided they accord with the principles of PPG17 and the Mole Valley PPG17 Assessment.</li> </ol>	<p>Policy CS16 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 16.13) as forming part of the policy context for the Project.</p> <p>In respect of part 4 of Policy CS16, works proposed by the Project within the administrative area of MVDC include the proposed Longbridge Roundabout (Church Meadows) replacement open space. The Project therefore accords with this part of Policy CS16 in providing new open space provisions in the District.</p> <p>The remaining parts of Policy CS16 are not applicable to the Project works falling within MVDC’s administrative area.</p>
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	<p>5. All development, except for the most minor, will be expected to contribute to the continued greening of the Districts towns and villages and the provision of, or connections to, the network of green infrastructure e.g. through the use of landscaping, retention of important mature trees, hedges, use of some forms of SUDs for example.</p>	
<p><b>How the Strategy will be Delivered</b></p>		
<p><b>Policy CS18: Transport Options and Accessibility</b></p>	<ol style="list-style-type: none"> <li>1. The availability of travel options and access will be given significant weight in allocating land for development and in considering development proposals.</li> <li>2. Transport schemes that lead to improvements in accessibility and give priority to the needs of pedestrians, cyclists and users of public transport will be supported.</li> <li>3. Development proposals will be required to be consistent with, and contribute to the implementation of the Surrey Local Transport Plan.</li> <li>4. The Council will require the submission of Travel Plans to accompany applications for development proposals above thresholds to be established through the Development Management Policies Development Plan Document. Such plans will be a condition of the</li> </ol>	<p>Policy CS18 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 10.31 and table on pages 146 to 159) as forming part of the policy context for the Project.</p> <p>The design of the surface access and active travel works for Longbridge Roundabout, within MVDC’s jurisdiction, are presented and described in the <b>Surface Access Highways Plan: General Arrangements</b> [<a href="#">APP-020</a>], <b>Surface Access Highways Plans: Engineering Section Drawings</b> [<a href="#">APP-021</a>], <b>Surface Highways Plans Structure Section Drawings</b> [<a href="#">APP-022</a>] and the <b>ES Agricultural Land Use and Recreation</b></p>

	<p>granting of planning permission and implemented through a Section 106 agreement.</p> <p>5. All new housing and commercial development will be subject to the development tariff, a component of which will be directed towards enhanced public transport, promotion of more sustainable transport choices and to support improvements in the range of transport options and accessibility to services and facilities by means other than the private car (in accordance with Policy CS17).</p>	<p><b>Figures</b> <a href="#">[APP-044]</a>. The proposals fully accord with parts 1 and 2 of Policy CS18 in providing options and accessibility improvements for pedestrians, cyclists as well as also improving capacity of the road network for vehicles including users of public transport.</p> <p>In respect of part 4 of Policy CS18, the <b>Transport Assessment</b> <a href="#">[AS-079]</a> also incorporates a Framework Travel Plan that will support the use of public transport and provides active travel measures, and outlines proposals for comprehensive monitoring of the mode share increases. A Travel Plan will also be implemented for construction workers, as part of the wider approach to managing the transport aspects of construction activity. This is set out in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 2 – Outline Construction Workforce Travel Plan</b> <a href="#">[APP-082]</a>, to be secured under Requirement 13 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p>
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		<p>The surface access works are proposed to provide mitigation for the increased volumes of traffic on roads in the locality and result in an acceptable impact on the transport network. The works within MVDC’s administrative area are part of a wider package of proposed highway interventions that are outside MVDC’s area, including transport-related obligations put forward in the <b>draft Section 106 Agreement</b> [<a href="#">REP2-004</a>] in line with part 5 of Policy CS18.</p>
<p>Policy CS19: Sustainable Construction, Renewable Energy and Energy Conservation</p>	<p>1. In order to support the Core Strategy's overarching aim of achieving sustainable development, and to reduce the causes of and effects of climate change, new buildings and the redevelopment and refurbishment of the existing building stock will be required to:</p> <ul style="list-style-type: none"> <li>a. minimise energy use through its design, layout and orientation;</li> <li>b. maximise on-site recycling facilities and the re-use and recycling of materials used in construction;</li> <li>c. meet at least Level 3 of the Code for Sustainable Homes for housing, or BREEAM 'Very Good' construction standards for all other development, or higher as dictated by future legislation and</li> </ul>	<p>Policy CS19 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 13.16) as forming part of the local policy context for the Project.</p> <p>Parts 1 and 2 of Policy CS19 is not applicable to the Project owing to no buildings being proposed in MVDC’s jurisdiction and Part 3 of Policy CS19 describes work to be undertaken by the Council, rather than a requirement of applications.</p>

	<p>guidance (Code Level 4 from 2013 and Code 6 by 2016). This must include a 10% reduction in total carbon emissions through the on-site installation and implementation of decentralised and renewable or low-carbon energy sources.</p> <ol style="list-style-type: none"> <li>2. Applicants will be required to submit evidence to demonstrate how these requirements have been met unless it can be demonstrated that compliance is not technically or financially achievable having regard to the type of development involved and its design.</li> <li>3. The Council will explore the opportunities for decentralised and renewable or low-carbon energy sources within the District.</li> </ol>	
<p>Policy CS20: Flood Risk Management</p>	<ol style="list-style-type: none"> <li>1. The Council will determine planning applications in accordance with the guidance contained within Planning Policy Statement 25 (Development and Flood Risk) and policy NRM4 (Sustainable Flood Risk Management) in the South East Plan. The SFRA will inform the application of the Sequential and Exceptional Test set out in Annex D of PPS25.</li> <li>2. The Council will not be seeking to allocate sites or permit applications for housing within Flood Zones 3a or 3b as it considers, after undertaking the SFRA, that there is sufficient land available to meet the requirements of the South East Plan outside of these areas. Applications or allocations within Flood Zone 2 will only be considered if it can be demonstrated that</li> </ol>	<p>Policy CS20 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 9.15) as forming part of the local policy context for the Project.</p> <p>Part 1 of Policy CS20 relies on guidance contained in now-revoked Planning Policy Statements and regional planning policies, which is recognised by MVDC in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 9.15). This part of the policy is therefore considered to be out of date.</p>

	<p>there are no suitable alternatives in areas at lower risk.</p> <p>3. The Council will expect to see the use of appropriate sustainable drainage systems (SUDS) as part of any development proposals. A Flood Risk Assessment will be required for sites within or adjacent to areas at risk of surface water flooding as identified in the SFRA. To further reduce the risk from surface water flooding all development should work towards mimicking greenfield run-off situations.</p> <p>4. Applications which relate specifically to reducing the risk of flooding (e.g. defence / alleviation work) will be supported so long as they do not conflict with other objectives for example, those relating to landscape and townscape character.</p>	<p>Parts 2 and 4 of Policy CS20 is not of relevance to the Project elements within MVDC’s jurisdiction.</p> <p>A Flood Risk Assessment (FRA) has been submitted and is contained <b>ES Appendix 11.9.6 [APP-147]</b> in accordance with part 3 of Policy CS20. The FRA provides an assessment of flood risk for the Project, assesses the potential flood effects on external receptors due to the Project and describes the Project’s flood mitigation strategy to mitigate these risks. In respect of the surface access improvements works, including works to Longbridge Roundabout, the surface water drainage runoff from new areas of highway would be restricted to pre-development rates and where possible, greenfield runoff rates. Further details of the outline drainage design for the surface access are included in <b>ES Appendix 11.9.6, Annex 2 [APP-148]</b>.</p>
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**Future Mole Valley (Local Plan 2020-2039): Main Modifications consultation (1 March – 23 April 2024)**

Policy Reference	Policy Description	Compliance Commentary
<b>Strategic Policies</b>		
Draft Policy S1: Sustainable Mole Valley	<p>Sustainable Development</p> <ol style="list-style-type: none"> <li>The Council will expect the development proposals and use of land to contribute positively to the social, economic and environmental enhancement of Mole Valley. Planning applications that are consistent with the policies in the plan (and with relevant policies contained within other elements of the Mole Valley Development Plan) will be supported, unless material considerations indicate otherwise.</li> </ol> <p>Housing Growth</p> <ol style="list-style-type: none"> <li>The Council will enable the delivery of new homes to help meet the needs of Mole Valley and the wider south-east region by aiming to deliver at least 6,384 new homes over the plan period 2020-2039 (336 new homes per annum). As this is below the current local housing need, the Council will undertake an early review of the plan, to be completed before the third anniversary of the adoption of the plan, to ascertain whether more housing capacity is deliverable or developable.</li> </ol>	<p>Draft Policy S1 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 3.22 and 15.35) as forming part of the local policy context for the Project. The Surrey LIR explains that once the Future Mole Valley Local Plan is adopted, Draft Policy S1 will set out the spatial strategy for the District.</p> <p>In respect of the Project, works proposed by the Project within the administrative area of MVDC relate to surface access works and active travel improvements at Longbridge Roundabout, together with Longbridge Roundabout (Church Meadows) replacement open space. As such, Parts 2, 3, 4, 5 and 6 of Draft Policy S1 are not applicable to the Project, but for part 6(g) which requires that MVDC work with developers to deliver transport improvements. The Project is in</p>

	<p>3. In order to achieve this target, the Council has adopted the following spatial strategy:</p> <ul style="list-style-type: none"> <li>a. Allocated town centre sites in Leatherhead and Dorking for housing-led redevelopment;</li> <li>b. Developed policy (Policy H2) and set indicative densities for site allocations to ensure brownfield land sites achieve their appropriate capacity</li> <li>c. Allocated outdated office complexes in Ashted and Dorking for housing-led regeneration;</li> <li>d. Released sites which were modest contributors to the objectives of the Green Belt for housing around the built up areas of Ashted, Bookham, Dorking and Leatherhead;</li> <li>e. Released sites which were modest contributors to the objectives of the Green Belt for housing within and around Hookwood to complement the economic growth point of the Gatwick area;</li> <li>f. Developed policy and amended Green Belt boundaries to permit appropriate development in the villages inset from the Green Belt, namely Beare Green, Brockham, Capel, Charlwood, and Westcott; and,</li> <li>g. Developed policy and amended village boundaries to permit limited infilling development in the villages washed over by the Green Belt and in the Countryside Beyond the Green Belt.</li> </ul>	<p>accordance with 6(g) by providing the Longbridge Roundabout improvement works.</p> <p>In respect of Part 7 of Draft Policy S1, relevant commentary is provided against Draft Policy EN1 on the Green Belt, Draft Policy EN6 on heritage assets and Draft Policy EN8 on Landscape Character. This demonstrates compliance with Part 7 of Policy S1.</p> <p>Part 8 of Draft Policy S1 describes work to be undertaken by the Council, rather than a requirement of applications.</p>
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	<p>4. As a result of these measures, the Council anticipates that that new housing will be delivered in the following locations in the following approximate proportions:</p> <p>Dorking area 23%          Leatherhead area 30%          Ashtead area 11%          Hookwood area 15%          Bookham area 7%          Rest of the District 14%</p> <p>Commercial, Industrial, Retail and Town Centre Growth</p> <p>5. To ensure a sustainable and balanced District, and to limit the need to commute and travel for goods and services, the Council:</p> <ol style="list-style-type: none"> <li>a. Has safeguarded existing sizeable commercial and industrial uses within designated commercial industrial areas;</li> <li>b. Will only permit the loss of sizeable commercial and industrial floorspace to other uses outside the designated areas provided certain criteria are met;</li> <li>c. Will permit new commercial and industrial uses, where appropriate;</li> <li>d. Has safeguarded existing sizeable town centre uses and retail uses within the shopping areas and local shopping centres;</li> </ol>	
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	<ul style="list-style-type: none"> <li>e. Will only permit the loss of sizeable town centre uses and retail uses outside the designated areas provided certain criteria are met; and,</li> <li>f. Will permit new town centre uses and retail uses, where appropriate</li> </ul> <p>Infrastructure Provision</p> <ul style="list-style-type: none"> <li>6. To ensure a liveable District, the Council will work with: <ul style="list-style-type: none"> <li>a. Surrey County Council to deliver new education provision in the north of the District;</li> <li>b. Surrey Downs Health and Care to deliver new and redeveloped health provision in Ashtead, Bookham, Dorking, Leatherhead and, if required, Hookwood;</li> <li>c. Developers to deliver new public open space in Ashtead, Bookham and Hookwood;</li> <li>d. Developers to deliver new childrens' play space along with new housing development in Ashtead, Bookham, Dorking, Hookwood and Leatherhead;</li> <li>e. Surrey County Council, Surrey Downs Health and Care and developers, as necessary, to deliver redeveloped community hubs in Ashtead, Bookham, Dorking and Leatherhead;</li> <li>f. Developers to deliver new early years facilities in Ashtead, Bookham, Dorking, Hookwood and Leatherhead;</li> </ul> </li> </ul>	
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	<ul style="list-style-type: none"> <li>g. Surrey County Council and developers to ensure District-wide and individual transport improvements take place across the District;</li> <li>h. Flood prevention schemes target areas of flood risk; and,</li> <li>i. Statutory undertakers to ensure utility improvements meet existing and new demands, especially in Ashted, Dorking, Leatherhead and Ockley</li> </ul> <p>Character Protection</p> <ul style="list-style-type: none"> <li>7. All development proposals will be expected to: <ul style="list-style-type: none"> <li>a. Conserve and enhance the Surrey Hills Area of Outstanding Natural Beauty and the District’s Area of Great Landscape Value;</li> <li>b. Minimise the impact on the integrity of the Green Belt;</li> <li>c. Preserve and, where required, enhance the District’s heritage and biodiversity assets; and,</li> <li>d. Protect other elements, designated or non-designated, which contribute to local character</li> </ul> </li> <li>8. The Council will produce design codes for the District in due course.</li> </ul>	
<p><b>Draft Policy S2: Combatting the</b></p>	<p>The Council will combat the Climate Emergency by working with partners to:</p>	<p>Draft Policy S2 is listed in the <b>Joint Surrey Councils Local Impact Report</b></p>

<p>Climate Emergency</p>	<ul style="list-style-type: none"> <li>- Meet targets to reduce carbon emissions from new development and the redevelopment and refurbishment of existing buildings and seek opportunities to retrofit existing buildings.</li> <li>- Reduce carbon emissions in transport sector</li> <li>- Ensure that the District is future proofed for the climate change</li> </ul> <p>Climate Change Mitigation</p> <ol style="list-style-type: none"> <li>1. To reduce carbon emissions from new buildings and the redevelopment and refurbishment of existing buildings, the Council will:             <ol style="list-style-type: none"> <li>a. Require all new development to be zero-carbon ready (ie it should need no significant work to ensure that they have zero carbon emissions as the grid decarbonises);</li> <li>b. Encourage proposals to use electricity produced on site in addition to decarbonised grid electricity. At individual dwelling scale, proposals could include: renewable energy-generating technology, such as solar panels or micro-wind turbines, and environmentally friendly heating technology, such as heat pumps, unless it is not practicable or could harm the amenity of occupiers and surrounding properties.</li> <li>c. Require developers of major new residential developments to make the development zero</li> </ol> </li> </ol>	<p><a href="#">[REP1-097]</a> (paras 13.19 and 17.10) as forming part of the local policy context for the Project.</p> <p>Part 1 of Draft Policy S2 is not applicable to the Project, owing to no buildings being proposed by the Project within MVDC's jurisdiction.</p> <p>Part 2 of Draft Policy S2 describes work to be undertaken by MVDC, rather than a requirement of applications. Notwithstanding this and in respect of part 2(a), the works within MVDC's jurisdiction include active travel improvements around Longbridge Roundabout for the benefit of cyclists and pedestrians and therefore in compliance with this element of the Draft Policy.</p> <p>With regards to Part 3 of Draft Policy S2, <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a> assesses potential climate change impacts on the Project. The resilience of the design, construction and operation of the Project against projected future climate change impacts is assessed in the</p>
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	<p>carbon (see Glossary for definition), preferably on-site or, if that is not practicable, through a carbon offset fund, administered by the Council and funding carbon reduction measures in Mole Valley; and,</p> <ul style="list-style-type: none"> <li>d. Seek funding opportunities to retrofit the existing building stock</li> </ul> <p>2. To reduce carbon emissions in the transport sector, the Council will:</p> <ul style="list-style-type: none"> <li>a. Work with developers, partners and funding agencies to create new walking or cycling routes or seek improvements to walking and cycling routes, such as upgrading public footpaths, new pedestrian crossings and footway widening to reduce conflict between cyclists and pedestrians;</li> <li>b. Work with partners and funding agencies to improve train frequency, rail station accessibility and bus stop accessibility and information; and,</li> <li>c. Deliver an increase in electric vehicle charging points availability and, where necessary, supporting electricity supply infrastructure (e.g. additional substations), through new development, funding schemes and in collaboration with UK Power Networks (or any successor provider).</li> </ul> <p>Climate Change Adaptation</p>	<p><b>Climate Change Resilience Assessment</b> contained in <b>ES Appendix 15.8.1</b> <a href="#">[APP-187]</a>. This takes account of embedded and mitigation measures proposed as part of the Project, including soft landscaping and drainage proposals and the <b>Design Principles</b> (Doc Ref. 7.3) in compliance with part 3 of Draft Policy S2</p> <p>Part 4 of Draft Policy S2 is not applicable to the Project as relating to the provision of renewable or low carbon energy generating infrastructure.</p>
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	<p>3. To ensure that the District is future proofed for climate change, the Council will expect all development to, where practicable and with reference to local character:</p> <ul style="list-style-type: none"> <li>a. Adopt passive design principles to limit energy use;</li> <li>b. Minimise resource use;</li> <li>c. Incorporate sustainable drainage systems; and,</li> <li>d. Retain or provide soft landscaping to create natural cooling measures, biodiversity habitats or promote local food growing</li> </ul> <p>Low Carbon Energy Generation Infrastructure</p> <p>4. The provision of renewable and low carbon, energy generation infrastructure should be located and designed to minimise potential adverse effects, with particular regard to conserving Mole Valley’s highly valued landscape and natural, historic and built environments. The erection of wind turbines should also have regard to the Aerodrome Safeguarding requirements.</p>	
<p><b>Draft Policy S5: Retaining and investing in Natural Capital</b></p>	<p>The Council will work with the Surrey Nature Partnership, statutory and voluntary bodies, the Surrey Hills Area of Outstanding Natural Beauty (AONB) Board, the River Mole Catchment Partnership and the development industry to</p>	<p>Draft Policy S5 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (paras 7.24 and 16.16) as forming part of the local policy context for the Project.</p>

	<p>protect and seek to replenish the natural capital of the District by:</p> <ol style="list-style-type: none"> <li>a. Ensuring that any decline in species richness in Mole Valley is reversed;</li> <li>b. Monitoring the trends in species recovery;</li> <li>c. Managing its own landholdings to protect and enhance natural capital assets;</li> <li>d. Providing mechanisms and policies to ensure that new development secures biodiversity net gain;</li> <li>e. Supporting initiatives to achieve the objectives of the Water Framework Directive and the River Mole Catchment Management Plan;</li> <li>f. Addressing issues of surface water drainage and fluvial flooding in ways that enhance wetland ecology and water quality;</li> <li>g. Supporting the objectives of the Surrey Hills AONB Management Plan in balancing landscape protection and enhancement with public enjoyment and nature recovery;</li> <li>h. Encouraging appropriate habitat management regimes that reflect the special characteristics of the District’s landscapes, such as heathlands, downland and woodlands ;</li> <li>i. Conserving the best quality agricultural land and supporting initiatives that protect and retain soil quality, reduce run-off of nutrients and pesticides into water courses and ground water, and encourage</li> </ol>	<p>Draft Policy S5 describes work to be undertaken by MVDC, rather than a requirement of applications. Notwithstanding this, relevant commentary on elements raised in Draft Policy S5 are provided against Draft Policy EN8 on landscape character, Draft Policy EN9 on natural assets, Draft Policy EN12 on pollution control and Draft Policy INF3 on flood risk.</p>
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	<p>uptake of incentive schemes to promote the recovery of nature as an investment in the associated environmental benefits, such as the Environmental Land Management Scheme (ELMS – including its Local Nature Recovery and Landscape Recovery sub-schemes);</p> <p>j. Ensuring adherence to national standards for air quality with appropriate and transparent monitoring;</p> <p>k. Safeguarding mineral sites and ensuring that restoration and after-use is undertaken to improved their species richness and, where practical, secure public access;</p> <p>l. Delivering a more extensive, resilient and connected network of natural capital assets.</p>	
<b>Housing</b>		
<p><b>Draft Policy H6: Housing for Older People and Specialist Housing</b></p>	<p><b>New Housing for Older Persons and Specialist Housing</b></p> <p>1. New developments providing specialist forms of accommodation for older people and for people with other specific needs will be supported, provided the following requirements are met:</p> <p>a. The site should be well-connected in terms of access to shops, community facilities including health care, public transport and other services appropriate to the needs of future occupiers;</p>	<p>Draft Policy H6 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 16.15) as forming part of the local policy context for the Project. However, the Project proposals do not relate to new housing for older persons or specialist housing within MVDC’s jurisdiction. As such, Draft Policy H6 is not of relevance to the Project.</p>

	<ul style="list-style-type: none"> <li>b. Developments should achieve, as a minimum, the standards of accessibility set out in Policy H10 and, for specialist older people’s housing and specialist housing likely to be by occupied people with mobility difficulties, appropriate areas should meet wheelchair user standards;</li> <li>c. Developments should provide appropriate indoor and outdoor amenity space as communal areas for socializing;</li> <li>d. Developments should provide safe storage and charging facilities for residents’ mobility scooters, in addition to pick up and drop off facilities close to the principal entrance suitable for taxis, minibuses and ambulances;</li> <li>e. Developments should be designed to meet any of the other needs of the client group;</li> <li>f. Developments providing older persons’ housing should deliver the level of affordable housing required by Policy H3; and,</li> <li>g. Developments including specialist accommodation for older people or people with disabilities (with or without care) will not be subject to the housing mix requirements set out under Policy H9</li> </ul> <p>Extensions to Housing for Older People and Specialist Housing</p>	
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	<p>2. Proposals for extensions and/or annexes to existing specialist forms of accommodation for older people and for people with other specific needs will be supported where the proposal:</p> <ul style="list-style-type: none"> <li>a. Respects the established character of the local area, is not overbearing or of a form that would be detrimental to the amenity of neighbouring residents and is sub-servient to the existing building;</li> <li>b. Is able to demonstrate the need and function of the annex or extension; and,</li> <li>c. Is in accordance with other relevant policies of the Local Plan, including Green Belt policy and policy for the Countryside beyond the Green Belt. In both cases, the development should not result in disproportionate additions over and above the size of the original building</li> </ul> <p>Loss of Housing for Older People and Specialist Housing</p> <p>3. The loss of existing specialist forms of accommodation for older people and for people with other specific needs will be resisted unless it is demonstrated to the Council's satisfaction that:</p> <ul style="list-style-type: none"> <li>a. There is adequate alternative provision provided locally;</li> <li>b. There is no longer a need for the housing; or,</li> </ul>	
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	<p>c. The accommodation no longer meets the minimum standards required for an acceptable quality of support and/or care and it is not practicable for the accommodation's standards to be updated or for the accommodation to be adapted for alternative specialist accommodation</p>	
<p>Draft Policy H10: Standards for Accessibility, Water and Space</p>	<p>Accessible and Adaptable Dwellings</p> <p>1. On sites of 10 or more new dwellings, a minimum of 10% of new dwellings will be required to meet Building Regulations standard M4 (2) 'accessible and adaptable dwellings'. Additionally, on sites of 20 or more new dwellings, a minimum of 5% of new dwellings will be required to meet Building Regulations standard Part M4 (3) 'wheelchair adaptable' to help meet the specific needs of older people and those with mobility, accessibility and support needs. Where the Council is responsible for allocating or nominating, an individual dwelling may be 'wheelchair accessible'. The number of dwellings provided to meet the specified standards should be rounded down to the nearest whole dwelling.</p> <p>Sustainable Water Use</p> <p>2. Development that results in the creation of one or more new residential dwellings, including</p>	<p>Draft Policy H10 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 16.16) as forming part of the local policy context for the Project. However, the Project proposals do not relate to new housing development within MVDC's jurisdiction. As such, Draft Policy H10 is not of relevance to the Project.</p>

	<p>conversions, change of use and extensions resulting in a new dwelling unit, will be required to reduce water consumption through meeting the optional Building Regulations Part G water efficiency standard of 110 litres per person per day.</p> <p>Minimum Space Standard</p> <p>3. All new dwellings, including changes of use and conversions, will be required to provide sufficient internal space to cater for future occupants. The gross internal floor area for each new dwelling should meet or exceed the Nationally Described Space Standard, set out in Appendix 3 or any subsequent equivalent standard.</p>	
<b>Economy</b>		
<p><b>Draft Policy EC1: Supporting the Economy</b></p>	<p>The sustainable growth of Mole Valley’s economy will be promoted to meet the varying needs of different economic sectors by:</p> <ol style="list-style-type: none"> <li>1. Supporting regeneration within the main towns of Leatherhead and Dorking, whilst encouraging new and established businesses to grow throughout the Plan area;</li> <li>2. Safeguarding sufficient employment sites and encouraging the recycling of land to meet the needs of the economy to support job creation, the needs of</li> </ol>	<p>Draft Policy EC1 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 15.37) as forming part of the local policy context for the Project.</p> <p>Draft Policy EC1 is not of relevance to the Project as the Project elements within MVDC’s jurisdiction do not correspond to development described in EC1.</p>

	<p>modern business and the attractiveness of Mole Valley as a business location;</p> <ol style="list-style-type: none"> <li>3. Redeveloping allocated campus-style office premises that will not meet future market requirements as mixed-use residential schemes with modern high quality office provision;</li> <li>4. Supporting the creation of windfall employment floorspace where the proposal would meet other policies in the Plan;</li> <li>5. Safeguarding local shopping centres for a range of uses suited to a centre;</li> <li>6. Supporting and promoting a high-quality visitor economy;</li> <li>7. Supporting and retaining employment opportunities in Mole Valley's villages and the rural areas, where consistent with other policies in the Plan; and</li> <li>8. Supporting initiatives to improve information and communications technology connectivity, while requiring new developments to include provision for advanced communications technology infrastructure.</li> <li>9. Supporting the Gatwick Diamond sub-region, along with the other partners - business leaders, business membership organisations, colleges and universities, other local authorities and government agencies - to grow the wider Gatwick region's existing jobs base, attract new jobs and secure investments, where appropriate.</li> </ol>	
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<p>Draft Policy EC2: Employment and Business Development</p>	<p>Strategic Employment Areas</p> <ol style="list-style-type: none"> <li>1. Within Strategic Employment Areas, as defined on the Policies Map and set out in Appendix 4, the Council will grant planning permission for office, research and development, light industry activities falling within Class E(g) (commercial, business and service), B2 (industrial and manufacturing) and B8 (storage and distribution) uses and for other similar office and industrial uses only. Changes of use from B2 and B8 to Class E will not be permitted, unless compatible with the overall functioning of the area.</li> <li>2. The Council will support the intensification of office and industrial uses within these locations, subject to there being no unacceptable impact on the surrounding highway network or local amenity.</li> </ol> <p>Outside Strategic Employment Areas</p> <ol style="list-style-type: none"> <li>3. Outside the Strategic Employment Areas office, research and development, light industrial activities falling with Class E(g) (commercial, business and service), B2 (industrial and manufacturing) and B8 (storage and distribution) uses and other similar office and industrial uses will be supported where:             <ol style="list-style-type: none"> <li>a. The type, scale and intensity of the proposed business activity is appropriate to the locality and accessibility of the site.</li> </ol> </li> </ol>	<p>Draft Policy EC2 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 15.37) as forming part of the local policy context for the Project. However, the Project proposals do not relate to the development of strategic employment areas or employment development within MVDC’s jurisdiction. As such, Draft Policy EC2 is not of relevance to the Project.</p>
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	<ul style="list-style-type: none"> <li>b. The proposed use would not harm the amenity or operation of neighbouring uses.</li> </ul> <p>4. Outside the Strategic Employment Areas, within the built up area, the redevelopment of employment land to other uses (outside Classes E(g), B2 and B8) will be supported where the site has been allocated for an alternative use or where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a. There is no reasonable prospect of the site remaining in employment use;</li> <li>b. Opportunities to reconfigure or reuse the site to retain its current use have been exhausted; and</li> <li>c. The site has been actively but unsuccessfully marketed for 12-month period at a reasonable market value with a recognised agent.</li> </ul>	
<p>Draft Policy EC3: The Urban Economy</p>	<ul style="list-style-type: none"> <li>1. Development that enhances the attraction of Dorking and Leatherhead town centres as destinations for shopping, business, leisure, cultural and recreational activities will be encouraged within the Town Centre Boundaries, as defined on the Policies Map.</li> </ul> <p>Dorking and Leatherhead</p> <ul style="list-style-type: none"> <li>2. Within the town centres of Dorking and Leatherhead, the Primary Shopping Area, as defined on the Policies Map, will remain the focus for retail activity and other town centre uses. In this area:</li> </ul>	<p>Draft Policy EC3 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 15.37) as forming part of the local policy context for the Project. However, the Project proposals do not relate to development within Dorking or Leatherhead town centres. As such, Draft Policy EC3 is not of relevance to the Project.</p>

	<ul style="list-style-type: none"> <li>a. Within the primary frontages at ground floor level, as defined on the Policies Map, development within Use Class E will normally be permitted.</li> <li>b. Within the secondary frontages at ground level, as defined on the Policies Map, development within Use Class E, Sui Generis uses suited to a town centre, Class F1 and Class F2(b) will normally be permitted.</li> <li>c. Within the primary and secondary frontages, the scale and nature of the proposed use should retain an active frontage at ground floor level and demonstrate a positive contribution to the vitality, viability, balance of services and/or evening economy of the town centre.</li> <li>d. Within the primary and secondary frontages, the effective and efficient use of upper floors for main town centre uses, town centre neighbourhood facilities, or residential use, is supported subject to other local planning policies.</li> </ul> <p>Local Shopping Centres</p> <ul style="list-style-type: none"> <li>3. Within the built up areas of Ashted, Fetcham and Bookham: <ul style="list-style-type: none"> <li>a. Existing local shopping centres, as defined on the Policies Map and set out in Appendix 6, will be maintained and enhanced where possible. The Council will support a range of Use Class E and</li> </ul> </li> </ul>	
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	<p>other appropriate uses in these centres. Development proposals involving a change of use from Class E will not be permitted unless the alternative use maintains an active frontage and a range and mix of products and services in the centre, without harming the vitality and viability of the local shopping centre.</p> <p>b. The retention and expansion of employment floorspace will be encouraged. Redevelopment proposals providing managed workspace, flexible workspace and/or nursery/starter accommodation will be particularly encouraged to support small businesses within the built up areas.</p> <p>Loss of a Commercial, Business or Service Use in a Designated Area</p> <p>4. Applications resulting in the loss of:</p> <p>a. Commercial, Business or Service use (Class E) in the primary frontages in Dorking or Leatherhead town centre will only be supported where it can be demonstrated that:</p> <p>i. There is no reasonable prospect of the site remaining in a Class E use;</p> <p>ii. Opportunities to reconfigure or reuse the site to retain its current use or another Class E use have been exhausted;</p>	
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	<ul style="list-style-type: none"> <li>iii. The site has been actively but unsuccessfully marketed for 12-month period at a reasonable market value with a recognised agent; and</li> <li>iv. The proposed alternative use would not adversely affect the vitality and viability of the town centre or local shopping centre.</li> </ul> <p>b. Class E, Class F1 and Class F2(b) or sui generis use suited to a centre in the secondary frontages of Dorking or Leatherhead town centre or in one of the Local Shopping Centres will only be supported where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>i. There is no reasonable prospect of the site remaining in a Class E use, Class F1 and Class F2(b) or sui generis uses suited to a centre</li> <li>ii. Opportunities to reconfigure or reuse the site to retain its current use or another Class E use, Class F1 and Class F2(b) or sui generis uses suited to a centre have been exhausted;</li> <li>iii. The site has been actively but unsuccessfully marketed for 12-month period at a reasonable market value with a recognised agent; and</li> <li>iv. The proposed alternative use would not adversely affect the vitality and viability of the town centre or local shopping centre.</li> </ul>	
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	<p>Out of Centre Town Centre Use Proposals</p> <p>5. Proposals for town centre uses outside of an existing town or local centre, as defined on the Policies Map, will be supported, provided:</p> <ul style="list-style-type: none"> <li>a. It can be demonstrated that there are no suitable sites in the town centre if the proposal is edge-of-centre and there are no suitable sites in the town centre or at the edge of the centre if the proposal is distant from the town;</li> <li>b. The site is well connected to the town centre; and;</li> <li>c. For retail and leisure development, the proposal is accompanied by an impact assessment, if the proposal is above the locally set threshold of 800sqm gross floorspace, which includes how the proposal will affect existing, committed and planned investment in the retail catchment area of the proposal and how the proposal will affect the vitality, viability, local consumer choice and trade in the town centre and wider catchment.</li> </ul>	
<p>Draft Policy EC4: The Rural Economy</p>	<p>1. To maintain a successful, sustainable and diverse rural economy, outside the built up area, the Council will:</p> <ul style="list-style-type: none"> <li>a. Support the diversification of rural businesses by encouraging the re-use and adaptation of</li> </ul>	<p>Draft Policy EC4 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 15.37) as forming part of the local policy context for the Project. However, the Project proposals within</p>

	<p>rural buildings for appropriate alternative employment uses, where this complies with other policies of the Plan;</p> <ul style="list-style-type: none"> <li>b. Support the limited extension or redevelopment of existing employment premises, where this is consistent with other policies of the Plan;</li> <li>c. Resist the loss of village shops and employment floorspace in the rural areas; and</li> <li>d. Support proposals that enhance digital connectivity in rural areas, including the delivery of superfast broadband to all rural communities and businesses, subject to compliance with Policy INF5.</li> </ul> <p>2. Applications resulting in the loss of a commercial, business or service use (Class E or similar Sui Generis use) or an employment use (Class B2, B8 or similar Sui Generis use) or a small shop (Class F2a) will only be supported where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a. There is no reasonable prospect of the site remaining in its current use;</li> <li>b. Opportunities to reconfigure or reuse the site to retain its current use or a use named above have been exhausted;</li> </ul>	<p>MVDC’s jurisdiction do not relate to the diversification of rural businesses, extension or redevelopment of employment premises, delivery of broadband services, or the loss of commercial/business/service uses or a small shop. As such, Draft Policy EC4 is not of relevance to the Project.</p>
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	<ul style="list-style-type: none"> <li>c. The site has been actively but unsuccessfully marketed for 12-month period at a reasonable market value with a recognised agent; and</li> <li>d. The proposed alternative use would not harm the vitality or viability of a small business cluster.</li> </ul>	
<p>Draft Policy EC5: Sustainable Leisure and Tourism</p>	<ul style="list-style-type: none"> <li>1. Development proposals for sport, recreation facilities and visitor attractions will be permitted where they comply with other policies in the plan and can demonstrate that:             <ul style="list-style-type: none"> <li>a. The scale and design of the development is appropriate to its setting and does not detract from the amenity, character, landscape setting and cultural or historical significance of the area;</li> <li>b. the enjoyment of the natural, historical and cultural assets of the area is encouraged consistent with the sustainable management of those assets;</li> <li>c. The design and location of facilities minimises the need to access them by private car, is acceptable in terms of the impact on the highway network, can provide a safe access to the attraction and is accessible by sustainable means of transport such as public transport, cycling and walking;</li> </ul> </li> </ul>	<p>Draft Policy EC5 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 16.16 and 17.11) as forming part of the local policy context for the Project.</p> <p>The landscaping principles and concept design for the Church Meadows replacement open space is contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan [APP-113]</b>, which will be developed through detailed Landscape and Ecology Management Plan for approval in line with Requirement 8 of the <b>Draft DCO [REP1-004]</b>. The landscape principles are in line with Draft Policy EC5 in that the design of the open space is required to be easily accessible by all groups of people, provide clear footpath connections and use</p>

	<ul style="list-style-type: none"> <li>d. Any additional pressures on the adjacent network of rights of way are mitigated;</li> <li>e. As far as reasonably possible, access to the facilities is available to the widest range of potential users, including people with disabilities;</li> <li>f. Where they are part of an agricultural enterprise, they are presented in the form of a WholeFarm Plan.</li> </ul>	<p>planting to soften the appearance of existing and improved infrastructure.</p> <p>In respect of part 1(d) of Draft Policy EC5, rights of way are assessed in <b>Section 8.10</b> of the <b>Planning Statement</b> [<a href="#">APP-245</a>], <b>Section 19.9</b> of <b>ES Chapter 19: Agriculture and Recreation</b> [<a href="#">APP-044</a>], <b>ES Appendix 19.8.1: Outline Public Rights of Way Management Strategy</b> [<a href="#">APP-215</a>] and in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [<a href="#">APP-113</a>]. The assessment demonstrates the Project will result in new public rights of way and improvements to existing public rights of way.</p>
<p><b>Draft Policy EC6: Agriculture, Horticulture and Forestry</b></p>	<p><b>New Buildings for Business Purposes</b></p> <ul style="list-style-type: none"> <li>1. New agricultural, horticultural or forestry development will be permitted where it can be demonstrated that the proposal: <ul style="list-style-type: none"> <li>a. Is to be sited on land which is in use for agriculture, horticulture or forestry for the purposes of a trade or business, or where it has been demonstrated that there is a reasonable</li> </ul> </li> </ul>	<p>Draft Policy EC6 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 16.16) as forming part of the local policy context for the Project. However, the Project proposals within MVDC’s jurisdiction do not relate to new agricultural, horticultural or forestry development or new/loss of dwellings for</p>

	<p>prospect of a viable trade or business becoming established, if the building is permitted;</p> <ul style="list-style-type: none"> <li>b. Is for a purpose and scale which is reasonably necessary for the purposes of the existing or proposed agricultural activities within the holding;</li> <li>c. Is sited and designed in a manner which minimises harm to the intrinsic character and beauty of the countryside, including by incorporating landscape mitigation measures where necessary; and,</li> <li>d. Does not replace buildings converted to alternative uses which could reasonably have continued in agricultural, horticulture or forestry use.</li> </ul> <p><b>New Dwellings for Land-Based Workers</b></p> <ul style="list-style-type: none"> <li>2. New dwellings for land-based workers will be permitted where they comply with the above criteria and also where: <ul style="list-style-type: none"> <li>a. There is an existing and well-established agricultural trade or business on the holding which is financially sound, and has clear prospect of remaining so;</li> <li>b. There is a clearly established existing functional need for the proposed dwelling to be at or near the holding that cannot be met by an existing</li> </ul> </li> </ul>	<p>land-based workers. As such, Draft Policy EC6 is not of relevance to the Project.</p>
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	<p>dwelling, including those in nearby settlements or villages;</p> <p>c. The proposed dwelling should be of a size commensurate with the essential need and should be able to be supported long-term by the rural enterprise; and, The need relates to a full-time worker or one who is primarily employed in agriculture and does not relate to a part time requirement.</p> <p>3. Where proposals for dwellings for land-based workers are permitted the Council will impose appropriate occupancy conditions to ensure the accommodation remains available for its intended purpose.</p> <p>Loss of Existing Dwellings for Land-Based Workers</p> <p>4. Applications for the removal of conditions restricting the occupancy of existing dwellings for agricultural or forestry workers will be permitted where evidence demonstrates that:</p> <p>a. There is no existing or foreseeable need at the business to which it is associated or in the local area; and,</p> <p>b. The property has been actively but unsuccessfully marketed for 12-month period at a reasonable market value with a recognised agent.</p>	
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Environment		
<p>Draft Policy EN1: The Green Belt</p>	<ol style="list-style-type: none"> <li>1. Land which is designated as Metropolitan Green Belt will be protected against inappropriate development, as defined by national policy. The extent of the Green Belt within Mole Valley is set out on the policies map.</li> <li>2. Inappropriate development will not be permitted in the Green Belt, unless very special circumstances are demonstrated which are concluded to outweigh the potential harm, including harm to the openness of the Green Belt and the purposes of including land within it.</li> <li>3. The following forms of development are exceptions to the definition of inappropriate development and will be permitted where they comply with other relevant policies in this Plan:               <ol style="list-style-type: none"> <li>a. Extension or alteration of an existing building, including ancillary buildings within the curtilage of an existing dwelling or other building, provided the development does not result in disproportionate additions over and above the size of the original building;</li> <li>b. Replacement of an existing dwelling or other building, provided the new building is in the same use and not materially larger than the one it replaces;</li> <li>c. Buildings or other structures which it has been</li> </ol> </li> </ol>	<p>Draft Policy EN1 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 6.26) as forming part of the local policy context for the Project.</p> <p>Works proposed by the Project within the administrative area of MVDC are not defined as inappropriate development in the Green Belt in accordance with the National Planning Policy Framework (December 2023) and Part 3 of Draft Policy EN1. As such, the Project does not conflict with Draft Policy EN1.</p>



	<p>demonstrated are reasonably necessary to support agricultural, horticultural or forestry use of the site, in accordance with Policy EC6;</p> <p>d. Appropriate buildings or facilities for outdoor sport, outdoor recreation, cemeteries, burial grounds and allotments, provided the proposed buildings and associated uses or activity would preserve the openness of the Green Belt and not conflict with the purposes of including land within it, by reason of their scale, design or siting. Where external lighting is proposed, or likely to be required, in connection with proposed outdoor uses, this should not result in light pollution adversely impacting on the amenities of neighbouring properties or the surrounding landscape, taking account of existing levels of artificial illumination in the surrounding area;</p> <p>e. The re-use of existing buildings which are of permanent and substantial construction, provided the physical changes and associated uses and activity would preserve the openness of the Green Belt and not conflict with the purposes of including land within it.</p> <p>f. Limited infilling in Tier 4 washed-over villages, in accordance with Policy EN3;</p> <p>g. Limited infilling or redevelopment of previously</p>	
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	<p>developed land where the new development would not have a greater impact on the openness of the Green Belt than the existing development;</p> <ul style="list-style-type: none"> <li>h. Reuse of previously developed land to meet an identified affordable housing need within Mole Valley, where the development would not cause substantial harm to the openness of the Green Belt;</li> <li>i. Limited affordable housing for local community needs, in accordance with Policy H4 or,</li> <li>j. Other forms of development specifically identified through national policy as exceptions to the definition of inappropriate development, including changes of use and engineering operations which preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.</li> </ul>	
<p>Draft Policy EN2: The Countryside Beyond the Green Belt</p>	<ul style="list-style-type: none"> <li>1. Within the Countryside Beyond the Green Belt, as set out on the policies map, the rural character and largely undeveloped nature of the countryside will be protected for its own sake.</li> <li>2. Development of new housing will be permitted only in locations which accord with Policies EN3 or H4 of this Local Plan, or through redevelopment of</li> </ul>	<p>Draft Policy EN2 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 6.27) as forming part of the policy context for the Project.</p> <p>The works proposed by the Project within MVDC’s jurisdiction do not fall within the areas designated as ‘Countryside beyond</p>

	<p>previously developed land in accordance with part 3b of this policy.</p> <p>3. The following forms of development will be permitted where they comply with other relevant policies in this Plan:</p> <p>a. Extension or alteration of an existing dwelling or other building, including provision of ancillary buildings within the curtilage of an existing dwelling or other building, provided the proposed development does not result in disproportionate additions over and above the size of the original building.</p> <p>b. Replacement of existing buildings, conversion of existing buildings to alternative use or redevelopment of previously developed land, provided the proposed development, including associated uses and activity, would not have an adverse impact on the rural character and largely undeveloped nature of the countryside, by reason of its scale, design or siting.</p> <p>c. Buildings or other structures which it has been demonstrated are reasonably necessary to support agricultural, horticultural or forestry use of the site, in accordance with Policy EC6.</p> <p>d. Buildings or structures for outdoor sport, outdoor recreation, cemeteries, burial grounds and allotments, provided the proposed buildings and associated uses or activity would not have an</p>	<p>the Metropolitan Green Belt', as shown on MVDC's Proposals Map<sup>4</sup> and taking account of the proposed Schedule of Changes as part of the draft Local Plan. As such, the Applicant does not consider Policy EN2 to be relevant to the Project.</p>
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<sup>4</sup> <https://www.planvu.co.uk/mvdc/index.php?map=proposals>

	<p>adverse impact on the rural character and largely undeveloped nature of the countryside.</p> <p>Where external lighting is proposed, or likely to be required, in connection with proposed outdoor uses, this should not result in light pollution adversely impacting on the amenities of neighbouring properties or the surrounding landscape, taking account of existing levels of artificial illumination in the surrounding area.</p> <p>e. Non-residential development where it has been demonstrated that:</p> <ul style="list-style-type: none"> <li>i. it will make a positive contribution to the rural economy;</li> <li>ii. it will improve the range of services to local rural communities;</li> <li>iii. a rural location is necessary and where factors in favour of the development clearly outweigh any harm to the rural and undeveloped character of the countryside; or</li> <li>iv. it will achieve specific strategic objectives of this Local Plan</li> </ul> <p>In all cases, the proposal will be required to demonstrate that a rural location is necessary and the factors in favour of the development clearly outweigh any harm to the rural character and the largely undeveloped character of the countryside, taking into all other relevant policies in this</p>	
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	<p>Local Plan, including those relating to the protection of the landscape, biodiversity and heritage.</p>	
<p>Draft Policy EN4: Character and Design</p>	<p>Local Character</p> <ol style="list-style-type: none"> <li>1. All new development must be of high-quality design that makes a positive contribution to its local character. All development proposals must demonstrate a thorough understanding of the site and how they relate to the existing area - including features of local distinctiveness - and take opportunities to improve the quality of the landscape and townscape.</li> <li>2. Within Development Opportunity Areas and large allocated sites (100+ dwellings), however, innovative and distinctive changes to the local character of these areas may be supported provided that the development responds sensitively to the site and surrounding area.</li> </ol> <p>Design Requirements</p> <ol style="list-style-type: none"> <li>3. To ensure that development respects, contributes to and enhances the local environment and character, subject to Part 2, any development proposals should:</li> </ol> <p>Relationship to the Wider Area</p>	<p>Draft Policy EN4 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 16.16) as forming part of the policy context for the Project.</p> <p>Parts 2, 4, 5, 6 and 7 of Draft Policy EN4 are not applicable to the works proposed by the Project within MVDC’s jurisdiction.</p> <p>In respect of Parts 1 and 3 of Draft Policy EN4, the application is supported by:</p> <ul style="list-style-type: none"> <li>• a comprehensive <b>Design and Access Statement Volumes 1 to 5 [APP-253 to APP-257]</b> which contains detailed analysis of the existing site and its surroundings, describes the Project proposals and demonstrates that the Project utilises principles of good design;</li> <li>• an assessment of the character of the site and its surroundings, contained in <b>ES Chapter 8: Landscape, Townscape and</b></li> </ul>

	<p>a. Complement the character of the area, responding to the prevailing pattern of development, the townscape and/or the landscape;</p> <p>b. Achieve a well-designed transition between the urban and rural environment on the urban fringe;</p> <p>c. Improve movement by creating safe and attractive access points, internal and egress routes for pedestrians, cyclists and motor vehicles, where practicable, and create a legible internal circulation for all transport modes within larger sites;</p> <p>d. Delineate clearly between public space (for recreation or social interaction) and private space, both in respect of the surrounding area and internally within larger sites;</p> <p>e. Retain existing townscape and landscape views and vistas and take the opportunity, where practicable, to reinstate or create new ones;</p> <p>Relationship to the Existing Built Development and Features</p> <p>f. Be of an appropriate scale, height, massing, proportion and form;</p> <p>g. Achieve appropriate spacing between buildings;</p> <p>h. Ensure existing building lines are respected;</p> <p>i. Respond to natural features and use them as features, where practicable;</p> <p>j. Ensure boundary treatments are well-designed and respect local context;</p>	<p><b>Visual Resources</b> <a href="#">[APP-033]</a> and which has informed the design development of the Project;</p> <ul style="list-style-type: none"> <li>• a suite of <b>Design Principles</b> (Doc Ref. 7.3) which the future detailed design must be in compliance with;</li> <li>• landscaping principles and concept designs contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, which will be developed through detailed Landscape and Ecology Management Plan for approval in line with Requirement 8 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</li> </ul> <p>Commentary in respect of Part 3(s) of Draft Policy EN4 is provided against Draft Policy EN12 on pollution control and Draft Policy IN2 on transport. This demonstrates compliance with Part 3(s) of Draft Policy EN4.</p>
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	<p><b>Materials and Building Design</b></p> <ul style="list-style-type: none"> <li>k. Use high-quality and durable materials;</li> <li>l. Include architectural detailing that responds to detailing on the host and/or surrounding buildings;</li> </ul> <p><b>Parking, Services and Utilities</b></p> <ul style="list-style-type: none"> <li>m. Ensure that car and cycling parking does not dominate the development and does not cause safety issues;</li> <li>n. Ensure bin storage is unobtrusive, supports recycling as well as disposal, does not harm the amenity of occupiers or users nearby and can be easily accessed by waste collection services.</li> <li>o. Ensure that utility equipment is unobtrusive, does not obstruct movement, and that building services equipment, and operating equipment in industrial areas, is integrated;</li> </ul> <p><b>Landscaping</b></p> <ul style="list-style-type: none"> <li>p. Retain existing trees, hedges and other flora, where practicable, and, where not, replace them in accordance with Policy EN9;</li> <li>q. Incorporate new soft landscaping, where appropriate;</li> <li>r. Incorporate new street trees, provided that the trees will not (i) disrupt underground and overhead utilities; (ii) obscure sightlines, especially for CCTV and public</li> </ul>	
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	<p>transport drivers; (iii) hinder pedestrian mobility as a result of heavy leaf-fall or exposed roots; or (iv) obscure natural light to dwellings;</p> <p>Amenity</p> <p>s. Ensure the amenity of future occupiers and of residents occupying properties in the surrounding area is not significantly affected. If the amenity effects of the proposed development can be made acceptable by mitigation measures, then the Council will seek these measures. Amenity can be significantly affected by:</p> <ul style="list-style-type: none"> <li>i. Overlooking, causing a loss of privacy;</li> <li>ii. Unacceptable visual impact;</li> <li>iii. Loss of sunlight, daylight, overshadowing or the need for artificial light;</li> <li>iv. Unacceptable traffic movements, to, from and within the site and car parking</li> <li>v. Lack of outlook or a sense of enclosure;</li> <li>vi. Noise and vibration levels and the times when such disturbances are likely to occur; and,</li> <li>vii. Odour, smoke, fumes, dust, litter accumulation, poorly located and designed refuse storage, exterior lighting and servicing;</li> </ul> <p>t. Take into account its suitability and compatibility with nearby uses and attempt to mitigate any adverse</p>	
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	<p>impacts through appropriate layout, design and management of the site;</p> <ul style="list-style-type: none"> <li>u. Ensure the reasonable enjoyment of the use of buildings, gardens and other spaces is not significantly affected due to the adverse impact on amenity from nearby uses; and,</li> <li>v. Where appropriate, be conditioned to prevent the ability to change use (as set out in the Town and Country Planning (General Permitted Development Order) 2015) without the need for planning permission to a use that would affect the amenity of those occupying nearby properties or residents of the surrounding area.</li> </ul> <p>Shopfronts</p> <ul style="list-style-type: none"> <li>4. The design of new shopfronts and other commercial signage and the re-design of existing shopfronts and commercial signage should demonstrate respect for the architecture and features of the buildings in or on which they are set and the character of the area. Design should have regard to the Council’s guidance for shopfronts: ‘Shopfront Design: A Guide to Good Practice’.</li> <li>5. The Council will resist the removal of shopfronts of architectural or historic interest.</li> </ul> <p>Advertisements and Hoardings.</p>	
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	<p>6. The Council will exercise strict control over the number, design and siting of advertisements and hoardings to ensure the character and amenity of individual buildings and streets are not materially harmed, having regard to the interests of amenity and public safety (including highway safety).</p> <p>7. In Areas of Special Control of Advertisements, see Appendix 7, a stricter degree of control over advertisement will apply. See Regulation 21 of the 2007 Town and Country Planning (Control of Advertisements) (England) Regulations and the associated schedules.</p>	
<p><b>Draft Policy EN5: Inclusive Environments</b></p>	<p>1. Developments providing 10 or more new dwellings are required to include dwellings which meet optional Building Regulations standards for accessible, adaptable and wheelchair user dwellings, as required by Policy H10.</p> <p>2. Vehicular parking for people with disabilities is required to be provided in accordance with Policy INF2. Parking bays for people with disabilities should be located as close as practicable to an accessible entrance to the building serve and the route between parking bay and entrance should be designed to avoid uneven surfaces, obstructions, steep gradients or other features likely to impair access.</p>	<p>Draft Policy EN4 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 16.16) as forming part of the policy context for the Project.</p> <p>Parts 1, 2, 3 and 6 of Draft Policy EN5 are not applicable to the works proposed by the Project within MVDC’s jurisdiction.</p> <p>In respect of part 4 of Draft Policy EN5, the design of the works proposed by the Project within the administrative area of MVDC are presented and described in the</p>

	<ol style="list-style-type: none"> <li>3. Residential or mixed use developments providing 50 dwellings or more are required to provide play space for children and young people as required by Policy EN10.</li> <li>4. Developments which include new streets and/or public spaces should be designed with regard to the needs of older people, including those living with dementia, people with disabilities or anyone whose mobility is reduced, by:             <ol style="list-style-type: none"> <li>a. Providing safe, easily navigable and accessible routes through the development, incorporating landmarks and environmental cues to aid navigation within larger developments;</li> <li>b. Within mixed use development, locating local services and community facilities in a central or easily-accessible part of the development and designing buildings with clearly identifiable and accessible entrances;</li> <li>c. Maximising connectivity to existing local services, public transport and green spaces located beyond the development;</li> <li>d. Designing public open spaces so that they are accessible to all and provide an interesting and stimulating sensory environment;</li> <li>e. Providing seating in new public open spaces and along longer pedestrian routes.</li> <li>f. Designing car parks, footpaths and public</li> </ol> </li> </ol>	<p><b>Surface Access Highways Plan: General Arrangements</b> <a href="#">[APP-020]</a>, <b>Surface Access Highways Plans: Engineering Section Drawings</b> <a href="#">[APP-021]</a>, <b>Surface Highways Plans Structure Section Drawings</b> <a href="#">[APP-022]</a> and through the landscaping principles and concept designs contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>, which will be developed through detailed Landscape and Ecology Management Plan for approval in line with Requirement 8 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>. The surface access and active travel measures have been designed to ensure their safety and accessibility, with Road Safety Audits having been undertaken to inform the design of the proposed highway improvements works.</p> <p>The landscaping principles for the Church Meadows replacement open space are in line with parts 4 and 5 of Draft Policy EN5 in that the design of the open space is required to be appropriately lit and have clear lines of sight to prevent criminal</p>
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	<p>spaces to support access by people with poor mobility, avoiding uneven surfaces, obstructions or excessive street clutter, minimising steep slopes or level changes;</p> <ul style="list-style-type: none"> <li>g. Providing buffer zones such as trees or grass verges between busy roads and footpaths or open spaces; and,</li> <li>h. Integrating any specialist housing into the wider development to facilitate social interaction for those who are unable to travel more widely.</li> </ul> <p>5. All new development should support the safety and security of the whole community through maximising natural surveillance, placing entrances in safe, visible locations, having a clear definition between public and private space and incorporating well-designed external lighting which enhances security while avoiding light pollution.</p> <p>6. In accordance with the Public Sector Equality Duty, where a proposed development is designed to meet specific needs relating to members of a protected group, the nature of those needs will be given appropriate weight in the decision-making process, alongside this and other policies of this Local Plan.</p>	<p>activity and anti-social behaviour; be easily accessible to all groups of people, including those with disabilities; include activities and amenities for different age groups and interests e.g. seating areas; and provide footpath connections with existing areas.</p> <p>The Project therefore accords with the relevant parts of Draft Policy EN5.</p>
<p><b>Draft Policy EN6: Heritage Assets</b></p>	<p>1. When conserving and enhancing designated and non-designated heritage assets, the Council will have regard to the impact of new development on their</p>	<p><b>Draft Policy EN6 is listed in the Joint Surrey Councils Local Impact Report</b></p>

	<p>fabric, integrity and significance, and their settings. Relevant heritage assets and designations are set out on the policies map. The following factors will be taken into consideration when assessing the impact of any development proposals:</p> <ol style="list-style-type: none"> <li>a. Achieving the appropriate repair of heritage assets and securing their long term viability;</li> <li>b. The significance and importance of the asset;</li> <li>c. The contribution to local identity and distinctiveness, including their wider significance to the architectural, cultural, artistic, social, economic life of the community;</li> <li>d. The degree to which proposals conserve and enhance heritage assets and their settings;</li> <li>e. The opportunities created to provide public access, understanding and enjoyment of heritage assets, for example through appropriate information signs and plaques; and,</li> <li>f. The cumulative impact of the proposals on heritage assets having regard to other relevant developments past and present.</li> </ol> <p><u>Archaeology</u></p> <ol style="list-style-type: none"> <li>2. Development proposals affecting Scheduled Monuments, County Sites of Archaeological Importance and Areas of High Archaeological Potential, as identified on the Policies Map, must be</li> </ol>	<p><a href="#">[REP1-097]</a> (para 5.16) as forming part of the policy context for the Project.</p> <p>Commentary on the Project’s impact on conservation areas, listed buildings and archaeology is provided against adopted Policies ENV39, ENV43 and ENV49 respectively.</p> <p>With regards to non-designated heritage assets and registered historic parks and gardens, <b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> provides an assessment of the Projects impacts on both these aspects, informed by <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a>. There are however no non-designated heritage assets or registered historic parks and gardens within the defined study areas falling within MVDC’s jurisdiction, as shown on <b>ES Figures 7.6.1 and 7.6.2</b> <a href="#">[APP-054]</a> and explained in Section 7.4 of <b>ES Chapter 7</b> <a href="#">[APP-032]</a>.</p> <p>The Project therefore does not conflict with Draft Policy EN6.</p>
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	<p>informed by a desk-based assessment and, where investigations advise it: a field evaluation, excavation and post-excavation assessment. Subsequent reporting, archiving and publication should form part of the Surrey Historic Environment Record.</p> <p>3. Great weight will be placed on the conservation of archaeological assets. Development proposals that would harm them will be required to justify their proposals in line with guidance in the National Planning Policy Framework.</p> <p>4. Outside County Sites of Archaeological Importance and Areas of High Archaeological Potential, the results of a desk-based archaeological assessment must be submitted with any development proposals for a site larger than 0.4ha. If the results of any desk-based assessment are inconclusive, or if they produce evidence of significant archaeological remains, then section 2 of this policy will be applicable.</p> <p><u>Listed Buildings and Structures</u></p> <p>5. Development proposals affecting Listed Buildings and Structures, as set out in Appendix 8 and 10, and their setting must be accompanied by a well-informed heritage statement that sets out a heritage asset's significance, which includes its history, architecture, construction and materials, and the impact of any</p>	
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	<p>proposal on that significance.</p> <p>6. Proposals that result in harm to a Grade I and II* Listed Building or Structure, whether substantial or less than substantial, will only be permitted in exceptional circumstances where a clear justification is provided and there are substantial public benefits.</p> <p>7. Proposals resulting in less than substantial harm to Grade II Listed Buildings or Structures must ensure that the harm is clearly justified and that any alterations are sensitive to the significance and character of the building or structure and its setting. Proposals that result in substantial harm or loss will only be permitted in exceptional circumstances where the public benefit outweighs the harm caused.</p> <p>8. Applicants will be required to make a record of significant architectural details and structures in circumstances where their loss is permitted and ensure that the record is made publicly available as part of the Surrey Historic Environment Record.</p> <p><u>Registered Historic Parks and Gardens</u></p> <p>9. Development proposals that result in substantial harm to a Registered Historic Park or Garden, as set out in Appendix 9, will not be permitted unless the circumstances are wholly exceptional and fully justified in terms of the public benefits that would outweigh the harm and where there is an absence of</p>	
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	<p>alternative, less damaging options.</p> <p>10. Proposals that result in less than substantial harm to a Registered Historic Park and Garden, including views out of and into it, will be assessed on the degree to which:</p> <ol style="list-style-type: none"> <li>a. The setting, special character, enjoyment and significance of the site is compromised;</li> <li>b. The harm can be mitigated; and</li> <li>c. Alternative, less harmful options have been considered.</li> </ol> <p><u>Conservation Areas</u></p> <p>11. The Council will keep the boundaries of designated Conservation Areas, as set out in Appendix 11, under regular review and revise boundaries and designate new Conservation Areas in line with national legislation and guidance.</p> <p>12. The Council will keep under regular review the boundaries of areas covered by Article 4 directions in Conservation Areas and consider their application to new areas in line with national policy guidance.</p> <p>13. Proposals resulting in the partial or total demolition of buildings or structures in a Conservation Area will only be permitted where:</p> <ol style="list-style-type: none"> <li>a. They are considered not to make a positive contribution to the Conservation Area; and,</li> <li>b. The replacement buildings or structures will</li> </ol>	
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	<p>contribute positively to the special character and appearance of the Conservation Area in which it is set.</p> <p>14. Proposals for new development, extensions and alterations to existing buildings, applications for changes of use and advertisements within Conservation Areas will:</p> <ol style="list-style-type: none"> <li>a. Be of high design quality;</li> <li>b. Make a positive contribution to and respect the character and appearance of the conservation in which it is set;</li> <li>c. Respect important views into and out of the conservation area;</li> <li>d. Respect local traditions of design, form and massing, scale and use of materials;</li> <li>e. Have regard to the traditional patterns of plot and road layouts;</li> <li>f. Protect trees and open spaces that reinforce local distinctiveness;</li> <li>g. Conserve or restore features such as boundary walls and hedges, doors, windows and chimneys; and,</li> <li>h. Have regard to published conservation area appraisals and management plans.</li> </ol> <p><u>Non Designated Heritage Assets</u></p> <p>15. The Council will continue to identify buildings and</p>	
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	<p>other features and structures that have a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.</p> <p>16. Proposals leading to the alteration or loss of a non-designated heritage asset will be considered on the basis of its architectural, archaeological, cultural and historic significance and contribution to the community, set against the scale of the alteration or loss.</p> <p><u>Heritage at Risk</u></p> <p>17. The Council will monitor the annual Heritage at Risk Register, compiled by Historic England, and work proactively with the owners of heritage assets listed on the register to find solutions for their long-term restoration, maintenance and beneficial use.</p>	
<p>Draft Policy EN8: Landscape Character</p>	<p>Landscape Principles</p> <p>1. To achieve a strategic approach to the conservation and enhancement of local landscape character, the Council will:</p> <ol style="list-style-type: none"> <li>a. Encourage developments, where appropriate, that are sensitive to their landscape and cultural context;</li> <li>b. Work with partners within the Surrey Hills AONB Management Board to fulfil the statutory</li> </ol>	<p>Draft Policy EN8 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 6.28 and 16.16 and table on pages 62 to 65) as forming part of the policy context for the Project.</p> <p>The Project has been assessed in terms of its potential effects upon Areas of Outstanding Natural Beauty (AONB). The</p>

	<p>purposes of the AONB designation to conserve and enhance its natural beauty and implement the statutory management plan;</p> <ul style="list-style-type: none"> <li>c. Work with partners in the Catchment Partnership to conserve and enhance the Mole Catchment and raise the quality of wetland landscapes in line with the Water Framework Directive;</li> <li>d. Encourage access to and appreciation of the local landscape;</li> <li>e. Support the countryside management partnerships in initiatives to manage the landscape and engage with volunteers in doing so;</li> <li>f. Require applicants for development that has the potential to impact adversely on local landscape character and its cultural significance to include with their proposals a Landscape and Visual Impact Assessment, a reasoned justification of their proposals, with any mitigation measures set out clearly.</li> </ul> <p>The Surrey Hills Area of Outstanding Natural Beauty</p> <p>2. The Surrey Hills AONB, as shown on the policies map, is a nationally important landscape designation and development proposals that fail to conserve and enhance the landscapes and scenic beauty within the</p>	<p>assessment is set out within <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> [<a href="#">APP-033</a>] and <b>Section 8.15</b> of the <b>Planning Statement</b> [<a href="#">APP-245</a>]. <b>ES Chapter 8</b> has also taken account of the respective AONB Management Plans, as detailed in Section 8.6.</p> <p><b>ES Chapter 8</b> also includes an assessment of effects on the perception of tranquillity within nationally designated landscapes. The assessment concludes that an increase of up to 20% in overflights compared to the future baseline in 2032 would result in minor adverse effects on perception of tranquillity, which is not significant. The Project will therefore not materially affect the positive qualities visitors and nearby residents expect of the AONBs (such as Surrey Hills), including distant scenic views and the landscape’s relative tranquillity and dark skies.</p> <p>In accordance with Part 1(f) of Draft Policy EN8, <b>ES Chapter 8</b> sets out the embedded or mitigation measures proposed as part of the Project, and which</p>
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	<p>AONB, their cultural significance and wildlife habitats will be refused.</p> <p>3. The scale of development within the Area of Outstanding Natural Beauty should be limited, and any development within its setting should be sensitively located and designed to avoid or minimise adverse impacts. Proposals for major development within the AONB will be refused unless there is an overriding public interest. Proposals will be judged in line with the exceptional circumstances tests set out in national policy, namely the need for the development; the cost or scope for meeting the need in another way and the extent of the detrimental effect on the landscape after moderation.</p> <p>4. When determining development proposals within the AONB or affecting its setting, regard must be had to the Surrey Hills AONB Management Plan as a statutory document and account will be taken of the Environmental Design Guidance published by the Surrey Hills Board.</p> <p>5. Development proposals lying outside the AONB, but which would spoil its setting by harming public views into or from the AONB, will be refused.</p> <p>The Area of Great Landscape Value</p> <p>6. Development proposals falling within the Area of Great Landscape Value, as shown on the policies</p>	<p>has informed the landscaping principles and concept designs contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>. The new landscaping provisions will be developed through detailed Landscape and Ecology Management Plan for approval in line with Requirement 8 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p> <p>As such, the Project does not conflict with Parts 1, 2 and 5 of Draft Policy EN8.</p> <p>The land within the Project boundary falling in MVDC’s administrative area is not within the designated Area of Outstanding Natural Beauty or Area of Great Landscape Value. As such, Parts 3, 4 and 6 of Draft Policy EN8 are not applicable to the Project.</p>
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	<p>map, will be required to demonstrate they would not harm the distinctive character and scenic beauty of the AGLV and/ or the setting of the adjacent AONB.</p> <p>Non-designated Landscapes</p> <p>7. Proposals that have an impact on the distinctive landscape character in which they are set will be required to demonstrate that they have taken into consideration the key characteristics, attributes and sensitivities of the landscape type in which the proposed development is to be located. Regard should be had to the landscape guidelines set out in the Surrey Landscape Character Assessment for Mole Valley.</p> <p>8. New development will be required to reinforce the scenic quality and distinctiveness of the landscape in which it is located and to be influenced by the local landscape context.</p> <ul style="list-style-type: none"> <li>a. Development proposals will assessed in relation to the following:</li> <li>b. Visual impact from public roads, footpaths and viewpoints;</li> <li>c. Integration into the landscape setting so as to sit comfortably within the topography, trees and woodlands, field boundaries and the settlement pattern;</li> </ul>	
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	<ul style="list-style-type: none"> <li>d. Cumulative impact in relation to other build development;</li> <li>e. Scale and design, including the choice of external materials;</li> <li>f. Visual impact of associated infrastructure such as car parking and access roads;</li> <li>g. Additional noise that will intrude on the tranquillity of the area;</li> <li>h. Lighting that would be visually intrusive, disrupt wildlife or result in a diminution of dark skies in remoter locations;</li> <li>i. Design of hard and soft landscaping around buildings and structures, including any screening measures and boundary treatments;</li> <li>j. Retention of visual linkages between settlements and their landscape setting;</li> <li>k. Restoration of landscape features, including wetlands and woodlands, and the removal of eyesores; and,</li> <li>l. Safeguard or enhance the existing network of statutory bridleways and footpaths or create new links in the network to facilitate access to into the landscape.</li> </ul>	
<p>Draft Policy EN9: Natural Assets</p>	<p><u>Biodiversity and Geodiversity in New Developments</u></p> <ul style="list-style-type: none"> <li>1. Where development proposals are likely to affect natural assets planning applications will be required</li> </ul>	<p>Draft Policy EN9 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 7.25, 8.9, 9.16 and</p>

	<p>to include an assessment of the impact of their proposals on native biodiversity, protected, otherwise endangered or vulnerable, species and habitats in line with the British Standard for Biodiversity: Code of Practice for Planning and Development BS42020.</p> <p>2. Development proposals will be supported where they:</p> <ul style="list-style-type: none"> <li>a. Demonstrate that consideration has been given to the conservation and enhancement of biodiversity at an early stage in the design process and measures to conserve and enhance native habitats and species are included as an integral part of the proposed development;</li> <li>b. Include measures to retain, protect and enhance significant habitats, species and geological interest;</li> <li>c. Take opportunities to create new natural areas alongside the restoration of existing habitats and geological features;</li> <li>d. Integrate wildlife habitats into built structures and their curtilages, for example through the incorporation of bird nest-boxes, bats' roosting features and, where appropriate, ponds;</li> <li>e. Include natural buffers to protect important adjacent habitats;</li> <li>f. Design their integral open spaces so as to maintain or create external wildlife corridors and</li> </ul>	<p>16.16) as forming part of the policy context for the Project.</p> <p>Commentary on the Project's assessment on ecology and nature conservation, including impacts on designated sites, species and nature conservation features, is provided against adopted Policies ENV12, ENV13, ENV14 and ENV15. These responses demonstrate that the Project does not conflict with Parts 1, 2, 4 and 7 to 11 of Draft Policy EN9.</p> <p>In respect of Part 3 of Draft Policy EN9 and as it stands, the net gain requirement is not in force for qualifying Nationally Significant Infrastructure Projects (such as this Project) under the Planning Act 2008 regime. Notwithstanding this, the application is accompanied by a <b>ES Appendix 9.9.2 : Biodiversity Net Gain Statement</b> <a href="#">[APP-136]</a>. The statement demonstrates that the Project would deliver a biodiversity net gain of over 20%, therefore well in excess of the 10% requirement that has been introduced by the Government for planning applications</p>
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	<p>to strengthen ecological networks beyond their boundaries;</p> <ul style="list-style-type: none"> <li>g. Utilise sustainable drainage opportunities to create biodiverse wetland areas where for example balancing ponds or other flood alleviation measures are required;</li> <li>h. Seek to minimise light disturbance, particularly in semi-rural and rural areas;</li> <li>i. Employ soft landscaping measures that reflect the characteristic ecology of the area;</li> <li>j. Realise opportunities to control or eradicate non-native invasive species;</li> <li>k. Realise opportunities to develop wildlife corridors between habitats and properties, where possible linking habitats and including passages to facilitate the movement of mammals, such as badgers and hedgehogs; and,</li> <li>l. Take due note of the biodiversity within established gardens, including their importance as wildlife corridors</li> </ul> <p><u>Biodiversity Net Gain</u></p> <p>3. Planning applications other than those relating to a change of use, house extensions, alterations to buildings, or where their limited scale presents demonstrable viability problems, must be</p>	<p>under the Town and Country Planning Act 1990 regime.</p> <p>The application is accompanied by an <b>Outline Arboricultural Method Statement</b> contained in ES Appendix 5.3.2, Annex 6 and which includes preliminary tree removal and protection plans in line with Part 5(a) of Draft Policy EN9. <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> sets out the justification for the removal of trees to facilitate Longbridge Roundabout highway improvements, in accordance with Part 5(b) of Draft Policy EN9.</p> <p>Parts 5(c) and 6 of Draft Policy EN9 is not relevant to the Project in that none of the trees within the Project boundary in MVDC’s jurisdiction are protected by a Tree Preservation Order or comprise trees in conservation areas.</p>
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	<p>accompanied by a Biodiversity Net Gain Plan. Using the Defra-recommended Biodiversity Metric version current at the time, the Plan will include:</p> <ol style="list-style-type: none"> <li>a. An appraisal of the baseline biodiversity habitat value of the site; a clear demonstration of the application of the Mitigation Hierarchy, to show first how the most important habitat(s) have where possible been retained on site; that any loss of remaining habitat(s) has next been mitigated using all measures available; and, after this, how any net remaining habitat loss is to be compensated that will result in an actual net gain of biodiversity at a minimum 20% over the baseline value;</li> <li>b. A clear statement as to where and how this required biodiversity net gain is to achieved; preferably within or adjacent to the development site as far as possible, but if demonstrably not practical to do so, provide details of the proposed use of a suitable and appropriate off-site solution (as an 'off-set' project). Preference will be given to off-sets located within Biodiversity Opportunity Areas (set out in Appendix 16) within the District; and,</li> <li>c. A management strategy that will ensure the realisation and eventual maintenance of the measures to achieve the required biodiversity</li> </ol>	
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	<p>net gain for a period of at least 30 years from the date that planning permission is granted.</p> <p><u>Woodland, Trees and Hedges</u></p> <p>4. New developments should:</p> <ul style="list-style-type: none"> <li>a. Maximise opportunities to protect existing and increase tree cover and extend or introduce new hedgerows, where appropriate, setting it within the context of a plan for biodiversity net gain and having regard to the prevalent tree species and landscape character;</li> <li>b. Incorporate well-designed soft and hard landscaping within a coherent and long-term management plan for private and communal spaces;</li> <li>c. Allow sufficient space for existing and newly planted trees to grow to maturity, both above and below ground;</li> <li>d. Have regard to the changing climate and prevalent tree diseases when selecting tree species, which should preferably be native species and be sourced in accordance with the national strategy for biosecurity.</li> </ul> <p>5. Where woodland, trees and hedgerows are present on a proposed development site:</p>	
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	<ul style="list-style-type: none"> <li>a. The planning application will be accompanied by a detailed appraisal of their condition, location and ecological and landscape significance both at the time of the application and with an assessment of their potential future value if retained. Applications should include an arboricultural method statement and tree protection plan to be followed during construction, reflecting the latest arboricultural standards for any tree works or development near to trees and demonstrating adequate root protection areas;</li> <li>b. Support will be given to development proposals that retain existing woodland, trees and hedgerows. Where woodland, trees and hedges are to be removed they should be accurately identified, with a clear justification set out for their loss, together with details of any mitigation or replacement planting as part of an overall approach to achieving biodiversity net gain. Development proposals that have not properly considered or prioritised development options enabling the retention of woodlands, trees and hedgerows will be refused;</li> <li>c. The removal of protected trees, woodlands and hedgerows will only be permitted in exceptional circumstances. The loss of ancient or veteran</li> </ul>	
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	<p>trees, ancient semi-natural woodland and 'important' hedgerows, as defined in the Hedgerow Regulations 1997, will be wholly exceptional on the grounds that their loss cannot be adequately compensated.</p> <p>6. When considering applications for the felling or surgery to trees protected by a Tree Preservation Order or trees in conservation areas, account will be taken of the health and stability of the trees, their public amenity value and overriding practical problems that may be caused by retaining them. Where felling is unavoidable, replacement native planting will be required unless there are exceptional circumstances.</p> <p><u>Designated Sites</u></p> <p>7. Proposals within or adjacent to designated wildlife sites will be required to provide a thorough assessment of their impacts on the recognised nature conservation interests, having regard to the status of the site, its designated interest features and its sensitivity to change.</p> <p>8. Within the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC), as shown on the Policies Map, there will be a strong presumption against new development unless the impact on the integrity of the SAC can be mitigated. An</p>	
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	<p>Environmental Impact Assessment and Habitats Regulations Assessment will be required.</p> <p>Development proposals for sites within 1.5km of the SAC will be required to meet the requirements of the Habitats Directive, particularly in relation to the Bechstein's bat qualifying feature. Habitats suitable for foraging and commuting bats from the SAC (such as deciduous woodland, mature treelines, species rich pasture or river corridors) must be preserved unless surveys demonstrate that they are not used by bats. Care must also be taken through development design to ensure that retained features are not impacted by artificial lighting. Developments within the Thames Basin Special Protection Area buffer zone, as shown on the Policies Map, will be required to be screened to ascertain if further assessment under the Habitat Regulations is necessary.</p> <p>9. Development proposals within or adjacent to Sites of Special Scientific Interest, Sites of Nature Conservation Interest, Regionally Important Geological Sites and Local Nature Reserves, as set out in Appendix 14 and identified on the Policies Map, will not be permitted where such proposals have an adverse impact on the biodiversity, geological conservation value or integrity of these sites, including their value to the wider network of green</p>	
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	<p>infrastructure, landforms and wildlife corridors, unless:</p> <ol style="list-style-type: none"> <li>a. The harm can be fully mitigated or pending that, suitably compensated is provided (in addition to the minimum 20% biodiversity net gain requirement),</li> <li>b. The benefits of the development clearly outweigh the irreparable loss of valued habitats or species; and</li> <li>c. The proposals have no reasonable alternative sites that would result in less harm.</li> </ol> <p><u>Conservation of Habitats and Species</u></p> <ol style="list-style-type: none"> <li>10. Development proposals that have an adverse impact on irreplaceable habitats as listed in, for example, the Surrey Nature Partnership’s 2020 guidance or the Habitats or Species of Principal Importance under Section 41 of the Natural Environment &amp; Rural Communities Act 2006 will be refused unless there are wholly exceptional circumstances and the impacts can be mitigated. Proposals will be expected to incorporate measures to maintain or restore as far as possible habitats or species of principal importance.</li> <li>11. Within and adjacent to areas designated as Biodiversity Opportunity Areas (BOAs), set out in Appendix 16, applications for development proposals must be accompanied by an assessment of the</li> </ol>	
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	<p>potential impact on the overall aims, specific objectives and known biodiversity interests therein, as reflected in the Policy Statement for the Biodiversity Opportunity Area concerned. Development proposals that contribute to these aims and objectives will be supported.</p>	
<p>Draft Policy EN10: Open Space and Play Space</p>	<p><u>New Non-Designated Open Space</u></p> <p>1. The provision of new or improved open space will be supported where an identified need can be demonstrated.</p> <p><u>Protection of Non-Designated Open Space</u></p> <p>2. The existing provision of non-designated open space will be safeguarded from development, unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a. The open space is no longer required;</li> <li>b. Appropriate alternative provision of a higher standard is made; or</li> <li>c. A partial reduction in the open space land on a site is justified by the need to provide essential community infrastructure development.</li> </ul> <p>In all the three cases above, an assessment will be required setting out as to whether the land in question:</p> <ul style="list-style-type: none"> <li>i. Makes a significant contribution to the character, environmental quality and amenity of the surrounding area;</li> </ul>	<p>Draft Policy EN10 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 16.16) as forming part of the policy context for the Project.</p> <p>The Project is compliant with part 1 of Draft Policy EN10 in that it includes the proposals for Longbridge Roundabout (Church Meadows) replacement open space within MVDC’s jurisdiction.</p> <p>Parts 2 and 3 of Draft Policy EN10 are not applicable to the Project proposals.</p> <p>In respect of part 4 of Draft Policy EN10, rights of way and access to the countryside are assessed in <b>Section 8.10</b> of the <b>Planning Statement [APP-245]</b>, <b>Section 19.9 of ES Chapter 19: Agriculture and Recreation [APP-044]</b>,</p>

	<ul style="list-style-type: none"> <li>ii. Provides essential social, community or recreational use;</li> <li>iii. Has a value as part of a network of wildlife corridors;</li> <li>iv. Provides public use of the land and forms part of a network of access routes;</li> <li>v. Could fulfil an alternative open space or recreational use; and,</li> <li>vi. Would have an adverse impact on the capacity of the remaining land to fulfil its open space and recreational functions.</li> </ul> <p><u>Open Space in New Housing Development</u></p> <p>3. To address needs arising from development, the provision of publicly accessible open space and equipped play space will be required on site as part of any development scheme delivering 50 net dwellings or more.</p> <p>a. Publicly Accessible Open Space</p> <ul style="list-style-type: none"> <li>i. The space should be usable, well designed and capable of fulfilling the various requirements of the future residents of the development and the wider community for exercise and relaxation in a natural setting; and,</li> <li>ii. Spaces should provide easy access for residents of the development and be accessible and welcoming to the wider local community.</li> </ul>	<p><b>ES Appendix 19.8.1: Outline Public Rights of Way Management Strategy</b> <a href="#">[APP-215]</a> and in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> <a href="#">[APP-113]</a>. The assessment demonstrates the Project will result in new public rights of way and improvements to existing public rights of way.</p>
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	<p>This should be achieved through design, the appropriate siting of spaces within the new development and legal agreements and management arrangements.</p> <p>b. Play Space</p> <p>On-site play space provision on development sites likely to house children should be as follows:</p> <ul style="list-style-type: none"> <li>i. For developments of 50 or more net dwellings, a Locally Equipped Area for Play is required.</li> <li>ii. In addition, for developments of 200 or more net dwellings, a publicly accessible Neighbourhood Equipped Area for Play is required.</li> <li>iii. In addition, for developments of 500 or more net dwellings, a publicly accessible Multi-Use Games Area is required.</li> </ul> <p>Where there is existing public open space or play facilities adjacent to the site, or where the Council agrees that it would be impractical to provide public open space or play facilities on site, an equivalent contribution towards the improvement of existing spaces or facilities may be agreed by the Council as an alternative to on-site provision.</p> <p>Community Infrastructure Levy funds may be used to contribute towards the upgrading of suitably located existing public open space or play areas, where there is an identified need.</p>	
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	<p><u>Protection and Enhancement of Public Rights of Way</u></p> <p>4. Public Rights of Way and National Trails will be protected from the adverse impacts of development and, where possible, new development should enhance the existing network and create new links to it.</p>	
<p>Draft Policy EN11: Local Green Space</p>	<p>1. The construction of new buildings is inappropriate within the areas designated as Local Green Space, as shown on the Policies Map and set out in Appendix 17. These areas will be safeguarded from development other than in very special circumstances, where the potential harm to the Local Green Space and the purposes of including land within it is clearly outweighed by other considerations.</p> <p>2. Limited improvements to access, outdoor recreation and wildlife, or community functions associated with the Local Green Space may be allowed where it would maintain or enhance the characteristics for which the Local Green Space was designated.</p> <p>3. Proposals to enhance, including its extension or alteration, an existing community facility associated with or within the boundary of a Local Green Space will be supported, provided that it does not result in disproportionate additions over and above the size of the original building and subject to maintaining or</p>	<p>Draft Policy EN11 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 16.16) as forming part of the local policy context for the Project. However, the Project proposals within MVDC’s jurisdiction do not fall within a designated Local Green Space. As such, Draft Policy EN11 is not relevant to the Project.</p>

	<p>enhancing the characteristics for which the Local Green Space was designated and other relevant planning policies.</p> <p>4. Proposals to replace a community building associated with or within the boundary of a Local Green Space will be supported, provided the new building is in the same use and not materially larger than the one it replaces, and subject to maintaining or enhancing the characteristics for which the Local Green Space was designated and other relevant planning policies.</p>	
<p>Draft Policy EN12: Pollution Control</p>	<p>1. Development should minimise exposure to, and the emission of, pollutants including noise, odour, air and light pollution. Proposals should ensure that they mitigate or avoid any adverse site specific or environmental impact that arises as a consequence of the development. In particular, proposals should:</p> <p>Contaminated Land</p> <p>a. Be supported by a preliminary risk assessment to determine the likelihood of contamination if the proposed development is located on or near to potentially contaminated sites. The scope of the preliminary risk assessment should be agreed with the Council and carried out by a suitably qualified person. Where necessary, proposals should be</p>	<p>Draft Policy EN12 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 16.16 and table on pages 297 to 298) as forming part of the local policy context for the Project.</p> <p>The ES submitted as part of the application provides a comprehensive assessment of the Project’s potential effects on the environment, including an assessment against matters contained in Draft Policy EN12. Details are set out below.</p>

	<p>supported by a detailed site investigation, undertaken prior to construction, to assess the nature and extent of contamination and any potential associated risks. Where unacceptable risks are identified, proposals must ensure the appropriate remediation of land, agreed with the Council.</p> <p>b. Take account of and address adverse ground conditions and land instability.</p> <p>Water Quality</p> <p>c. Maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevent contaminated run-off. Where impacts of a development on water quality are likely, applications should be supported by an assessment of the likely impacts and appropriate mitigation strategies.</p> <p>d. Where development falls within a sensitive groundwater location such as a Source Protection Zone or Safeguard Zone, as defined by the Environment Agency, consider the impact of the development on the quality of the water supply and take appropriate measures to eliminate contamination risks.</p> <p>e. Connect to mains foul sewage systems, wherever possible. Where this is not possible, justification will</p>	<p><b>ES Chapter 10: Geology and Ground Conditions</b> [APP] sets out the assessment of potential pollution, ground conditions and contamination effects of the Project, supported by a <b>Preliminary Risk Assessment</b> in <b>ES Appendix 10.9.1</b> [APP-138] in accordance with Part 1(a) of Draft Policy EN12. Mitigation measures, including a discovery strategy and ground investigations for contamination, are set out in Section 10.8 of ES Chapter 10 in compliance with Part 1(b) of Draft Policy EN12.</p> <p>Commentary relating to matters contained in Parts 1(c), (d), (e) and (f) is provided against adopted Policy ENV65, ENV67 and ENV68.</p> <p><b>ES Chapter 13: Air Quality</b> [APP-038] provides an assessment of potential effects on air quality as a result of the Project. The assessment demonstrates that, subject to mitigation measures as set out in <b>Section 13.9</b> of <b>ES Chapter 13: Air Quality</b> [APP-038] and in <b>ES Appendix 5.3.2: Code of Construction Practice</b></p>
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	<p>be required. Non-mains foul drainage will be refused in sensitive groundwater areas.</p> <p>f. Ensure that, for any additional demand for water supply, surface water drainage, foul drainage and sewerage treatment capacity arising from additional dwellings, the applicant, together with the relevant statutory undertaker, has demonstrated that sufficient capacity exists to serve the development and that the development would not lead to shortages for existing users.</p> <p>Air Quality</p> <p>g. Avoid increasing exposure to poor air quality, including odour, particularly where vulnerable people are located (such as health facilities, care homes or schools).</p> <p>h. Contribute towards the achievement of national air quality objectives by demonstrating that significant new emission sources will be suitably mitigated to be as low as reasonably practicable. Proposals that would have significant adverse impacts on air quality or expose the public to existing sources of air pollution, either as a result of the on-site activities or traffic movements, will be resisted unless appropriate mitigation measures are put in place to reduce these impacts to acceptable levels.</p>	<p><a href="#">[REP1-021]</a>, the Project complies with Draft Policy EN12 and there are not predicted to be any significant air quality effects as a result of the Project.</p> <p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> provides an assessment of the Project's potential effects on noise and vibration. An element of the Project's proposed mitigation relates to a noise insulation scheme. Full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in <b>Section 8.21</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. These documents confirm that, subject to embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration environment.</p> <p>With regards to Part 1(m) of Draft Policy EN12, <b>ES Appendix 5.2.2: Operational Lighting Framework</b> <a href="#">[APP-077]</a> is</p>
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	<p>i. Be supported by a technical odour assessment where they are a sensitive development located close to a Sewage Treatment Works or other odorous source. The technical assessment should be undertaken in consultation with the relevant statutory undertaker to confirm that there is no adverse amenity impact on the future occupiers, or that the adverse amenity impacts can be sufficiently mitigated.</p> <p>Noise and Vibration</p> <p>j. Avoid locating noise and vibration-sensitive uses, such as health facilities, housing and schools, close to existing noise disturbance, unless the impact can be shown to be acceptably mitigated.</p> <p>k. Avoid locating noise and vibration-generating uses, such as transport and industrial activities, close to existing noise-sensitive uses, unless the impact can be shown to be acceptably mitigated.</p> <p>l. In high noise or vibration environments or where there is a reasonable possibility of significant adverse noise or vibration impacts (including volume, pitch, time of day, frequency and pattern), incorporate the site zoning of sources and receptors and include other mitigation measures, where appropriate, to ensure existing and future occupiers are not subjected to an unacceptable level of noise disturbance, both within buildings and externally.</p>	<p>provided as part of the application. This sets out the framework for the use of external lighting for the operation of the Project. The framework sets out objectives for the operational lighting, such as to mitigate impacts associated with lighting on sensitive receptors (such as residents, heritage sites, and local flora and fauna) and to consider energy efficiency in the design and operation of lighting.</p> <p>With regards to Part 1(n) of Draft Policy EN12, the application is supported by a <b>Code of Construction Practice</b> contained in <b>ES Appendix 5.2.3</b> <a href="#">[REP1-021]</a> which sets out measures to be implemented during the construction of the Project to reduce, as far as possible, the effects of construction activities. The CoCP is secured by Requirement 6 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p>
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	<p>Such proposals should be supported by a noise assessment that determines whether the overall effect of noise exposure (including construction impacts) would be acceptable with regards to the Noise Policy Statement for England.</p> <p>Light</p> <p>m. Incorporate measures to minimise the intrusiveness of artificial lighting and thus the potential adverse impacts on residential amenity, character, public safety, sensitive wildlife, watercourses and quality of life. These measures could include full cut-off luminaries (to emit no direct uplighting), recessed lighting, dimmers, timers, and equipment which minimises blue light emission.</p> <p>Construction Impacts</p> <p>n. Minimise the impacts of air pollution, dust, odour, noise, vibration, water pollution, soil contamination and CO<sub>2</sub> emissions on nearby sensitive locations arising from demolition and construction.</p> <p>Other</p> <p>o. Mitigate or avoid any other adverse site specific or environmental impact that arises as a consequence of the development.</p>	
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<p>Draft Policy EN13: Standards and Targets for Combatting the Climate Emergency</p>	<p>Climate Change Mitigation</p> <ol style="list-style-type: none"> <li>1. To reduce carbon emissions from new buildings and the redevelopment and refurbishment of existing buildings, the Council will:             <ol style="list-style-type: none"> <li>a. Require all new development to be zero-carbon ready (ie it should need no significant work to ensure that they have zero carbon emissions as the grid decarbonises), as set out in the written ministerial statement of 13 December 2023;</li> <li>b. Encourage proposals to use other electricity produced on site in addition to decarbonised grid electricity. At individual dwelling scale, proposals could include: renewable energy-generating technology, such as solar panels or micro-wind turbines, and environmentally friendly heating technology, such as heat pumps, unless it is not practicable or could harm the amenity of occupiers and surrounding properties.</li> <li>c. Require developers of major new residential developments to make the development zero carbon (see Glossary for definition), preferably on-site or, if that is not practicable, through a carbon offset fund, administered by the Council and funding carbon reduction measures in Mole Valley; and</li> <li>d. Permit extensions to existing dwellings to accommodate low carbon energy generation</li> </ol> </li> </ol>	<p>Draft Policy EN13 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 13.21, 16.16 and 17.10) as forming part of the local policy context for the Project.</p> <p>Parts 1, 2(b), 2(c) and 3(a) of Draft Policy EN13 are not applicable to the Project given the works proposed within MVDC’s jurisdiction.</p> <p>The works within MVDC’s jurisdiction include active travel improvements around Longbridge Roundabout for the benefit of cyclists and pedestrians and therefore the Project is compliant with Part 2(a).</p> <p>Elements listed under Part 3 of Draft Policy EN13 relate to design elements for new or converted buildings, which is not applicable to the Project proposals within MBDC’s jurisdiction. Regardless, <b>ES Chapter 15: Climate Change [APP-040]</b> assesses potential climate change impacts on the Project. The resilience of the design, construction and operation of the Project against projected future climate</p>
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- equipment provided they are of the smallest size necessary to accommodate the equipment only and do not harm the amenity of neighbours or the character of the area.
2. To reduce carbon emissions in the transport sector, the Council will:
    - a. Permit developments which create new walking and cycling routes or result in improvements to existing walking and cycling routes; and,
    - b. Expect electric charging points to be delivered for the following types of developments in the following proportions (see also Policy INF2):

Development Type	Number of Electric Charging Points
C3: Houses	1 fast charge socket per house A minimum 7kw charge point 230v AC 32 Amp Single Phase dedicated supply
C2: Flats	1 fast socket per flat (allocated and unallocated spaces) A minimum 7kw charge point

change impacts is assessed in the **Climate Change Resilience Assessment** contained in **ES Appendix 15.8.1** [\[APP-187\]](#). This takes account of mitigation measures proposed as part of the Project, including soft landscaping and drainage proposals and the **Design Principles** (Doc Ref. 7.3).

		230v AC 32 Amp Single Phase dedicated supply	
	B2: General Industrial, over 500sqm B8: Storage and Distribution, over 500sqm C1: Hotels C2/C3 – Care Homes and Sheltered Housing E: Shops, over 500sqm F1: Schools and Colleges F2: Sports Clubs, Health Clubs, Leisure Centres and Conference Centres, over 500sqm SG: Theatres and Cinemas	20% of available spaces to be fitted with a fast charge socket A minimum 7kw charge point 20% of available spaces to be provided with a power supply to provide a fast charge socket Feeder pillar or equivalent 230v AC 32 Amp Single Phase dedicated supply	
	All other uses	Specific assessment or justification	
	<p>c. Expect larger developments to have considered mobility hubs (central area for electric charging, cycle sharing and car clubs) with the evolution of a scheme design.</p> <p>Climate Change Adaptation</p> <p>3. To ensure that the District is future proofed for climate change, the Council will expect all development</p>		

	<p>(including the conversion of existing buildings) to, where practicable and with reference to local character:</p> <ul style="list-style-type: none"> <li>a. Adopt passive design principles, including orientation, glazing and shading with regard to the winter and summer sun and zero energy or low energy ventilation;</li> <li>b. Minimise resource use during construction and post-construction to achieve the maximum possible Standard Assessment Procedure score (see also Policy H10);</li> <li>c. Reuse construction waste on site or arrange for the waste to be reused or recycled;</li> <li>d. Incorporate sustainable drainage systems, such as green roofs, green walls, rainwater harvesting, permeable paving, rainwater gardens, swales, reed beds and treatment and balancing ponds;</li> <li>e. Retain and/or provide soft landscaping to create natural cooling measures, biodiversity habitats or local food growing. The soft landscaping should have reference to native species and local character (see also Policy EN8); and,</li> <li>f. Install community composting facilities, where practicable.</li> </ul>	
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**Infrastructure Policies**

<p>Draft Policy INF1: Transport</p>	<p>Transport Impact</p> <ol style="list-style-type: none"> <li>1. Development proposals will be assessed for their impact on the highway and public transport network as well as the local environment and should be located so as to minimise any adverse impact on the highway network and maximise the use of sustainable modes of transport. Applicants should set out how they propose to manage and mitigate the transport impacts of their development. Planning permission will only be granted if any adverse impacts of the development can be overcome by transport improvements considered necessary by the Council.</li> </ol> <p>Design of New Developments</p> <ol style="list-style-type: none"> <li>2. Developers are required to contribute to the delivery of an integrated, accessible and safe transport network, and maximise the use of sustainable transport modes, such as walking, cycling and public transport. This includes:             <ol style="list-style-type: none"> <li>a. Providing high-quality, well-designed, safe and direct walking and cycling routes, with priority over other traffic;</li> <li>b. Improving existing walking and cycling routes to local facilities, services, bus stops and railway stations;</li> <li>c. Providing opportunities to establish car clubs and cycle rental schemes.</li> </ol> </li> </ol>	<p>Draft Policy INF1 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 10.32, 16.16 and 17.10 and table on page 146 to 160) as forming part of the local policy context for the Project.</p> <p>The <b>Transport Assessment [AS-079]</b> and <b>ES Chapter 12: Traffic and Transport [APP-037]</b> provide the assessment of the potential transport impacts of the Project, in accordance with Draft Policy INF. <b>Section 12.6 of ES Chapter 12: Traffic and Transport [APP-037]</b> explains the existing transport network, public transport routes and cycling and walking network in relation to the Project, and <b>Section 12.8</b> sets out the mitigation and enhancement measures proposed as part of the Project to increase the use of public transport and provide active travel measures.</p> <p>The <b>Transport Assessment [AS-079]</b> contains the assessment of the Project's impacts on traffic congestion and highway safety in line with Draft Policy INF1. As set out in Section 8.4 of the <b>Planning</b></p>
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	<p>d. Providing facilities that will increase the uptake of electric and other zero emission vehicles.</p> <p>Travel Plans</p> <p>3. Where new development will generate a significant amount of trips, such as educational establishments, large business premises or large-scale residential developments, the developers are required to prepare and keep up-to-date a travel plan containing measures to reduce car use and promote sustainable transport modes.</p> <p>Safeguarded Land</p> <p>4. The Council will safeguard land and a buffer, as shown on the Policies Map, from development for improvements to the A24 between the southern District boundary and the Clark's Green roundabout.</p>	<p><b>Statement</b> <a href="#">[APP-245]</a>, the Project will generate increased traffic and transport demands. Overall, however, the Project limits those impacts to acceptable levels, whilst providing enhancements to the local highway network and to active travel and public transport networks.</p> <p>In respect of part 3 of Draft Policy INF1, the <b>Transport Assessment</b> <a href="#">[AS-079]</a> also incorporates a Framework Travel Plan that will support the use of public transport and provides active travel measures, and outlines proposals for comprehensive monitoring of the mode share increases. A Travel Plan will also be implemented for construction workers, as part of the wider approach to managing the transport aspects of construction activity. This is set out in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 2 – Outline Construction Workforce Travel Plan</b> <a href="#">[APP-082]</a>, to be secured under Requirement 13 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p>
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		Part 4 of Draft Policy INF1 is not applicable to the Project.
Draft Policy INF2: Parking	<p>Vehicle Parking</p> <ol style="list-style-type: none"> <li>1. Developers of residential developments will be required to provide a minimum number of off- street vehicular parking spaces, for residents and visitors, in accordance with the levels shown in Appendix 18: Local Parking Standards.</li> <li>2. Developers of non-residential developments will be required to provide a maximum number of off-street vehicular parking spaces in accordance with the levels shown in Appendix 18: Local Parking Standards.</li> <li>3. Developers of educational establishments are required to meet additional standards on school parking set out in Appendix 18: Local Parking Standards.</li> </ol> <p>Disabled Parking</p> <ol style="list-style-type: none"> <li>4. Developers of non-residential and communal residential developments with unallocated residential parking will be required to provide an additional 5% of total vehicular parking spaces for people with disabilities (blue badge holders). Disabled parking spaces must:             <ol style="list-style-type: none"> <li>a. have dimensions of at least 3.6m by 5m;</li> </ol> </li> </ol>	Draft Policy INF2 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 10.33 and 16.16) as forming part of the local policy context for the Project. However, the Project proposals within MVDC’s jurisdiction do not relate to car parking proposals and therefore Draft Policy INF2 is not of relevance to the Project.

	<ul style="list-style-type: none"> <li>b. be located no further than 50m from the main entrance or an accessible entrance if the main entrance is not accessible; and,</li> <li>c. be clearly signed and preferably under cover.</li> </ul> <p><b>Garages</b></p> <p>5. Developers of residential developments proposing garages as a parking space will be required to ensure garages are a sufficient size to provide space for both domestic storage and parking. Garages should have internal dimensions of least 6m by 3m to be counted as a parking space. For developments resulting in the loss of garages, developers will be required to demonstrate that either adequate parking space remains on site, can be re-provided off-street or additional on-street parking would not adversely affect the operation of the highways network.</p> <p><b>Car Clubs</b></p> <p>6. Where developers are proposing car clubs, dedicated parking provision for car clubs will be supported where appropriate and on a case-by-case basis.</p> <p><b>Electric Vehicle Charging Points</b></p> <p>7. Developers will be required to provide electric vehicle charging points in accordance with the levels shown</p>	
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	<p>in Appendix 18: Local Parking Standards. Charging points, delivering at least 7kW, will be required.</p> <p>Cycle Parking</p> <p>8. Developers will be required to provide a minimum number of cycle parking spaces in accordance with the levels shown in Appendix 18: Local Parking Standards. Cycle parking will need to be secure, accessible and convenient. Developers of non-residential developments are also required to provide facilities to encourage cycling to places of work.</p>	
<p>Draft Policy INF3: Flood Risk</p>	<p>Flood Risk Schemes</p> <p>1. The Council will work with partners, in particular the Environment Agency, Surrey County Council as the Lead Local Flood Authority, the Catchment Partnership and the Surrey Flood Risk Partnership Board to manage flood risk in the District and implement schemes that mitigate risk, safeguarding land for such schemes where appropriate, whilst preventing the pollution of ground and surface water, improving water quality in rivers and streams and increasing the biodiversity of wetland habitats.</p> <p>New Development and Flood Risk</p> <p>2. All development will seek to avoid, reduce or mitigate flood risk by:</p>	<p>Draft Policy INF2 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 9.17 and 16.16) as forming part of the local policy context for the Project.</p> <p>Commentary on matters contained in Draft Policy INF3 is provided against adopted Policy CS20. This demonstrates compliance with Policy INF3.</p>



	<ul style="list-style-type: none"> <li>a. Ensuring development is directed towards areas of lowest flood risk from any source by applying the Sequential Test;</li> <li>b. (If the Sequential Test cannot be met), using the Exception Test to determine whether the development is both justifiable on sustainability grounds and that flood risk can be managed satisfactorily,</li> <li>c. Undertaking a Flood Risk Assessment for all developments over 1ha in Flood Zone 1, all developments in Flood Zones 2, 3a and 3b and for other development in Flood Zone 1 that the Environment Agency and/or Surrey County Council identify as vulnerable to particular flood and drainage issues;</li> <li>d. Permitting:             <ul style="list-style-type: none"> <li>i. more vulnerable development within Flood Zone 3a, only if the Exception Test has been passed, and;</li> <li>ii. essential infrastructure, only if the Exception Test has been passed and it has been designed and constructed to remain operational and safe in times of flood;</li> </ul> </li> <li>e. Avoiding development entirely in Flood Zone 3b with the exception of essential infrastructure uses provided the Exception Test has been</li> </ul>	
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	<p>passed, and requiring both essential infrastructure and water-compatible development to be designed and constructed to:</p> <ul style="list-style-type: none"> <li>i. remain operational and safe in times of flood</li> <li>ii. result in no net loss of floodplain storage</li> <li>iii. not to impede water flows or increase flood risk elsewhere;</li> </ul> <ul style="list-style-type: none"> <li>f. Adopting flood mitigation measures that are appropriate to the source of the flooding, its frequency and its intensity;</li> <li>g. Incorporating mitigation measures at an early stage in the design process, taking a sequential approach to the location of built structures within the site, designing buildings to reflect the flood risk and making space for water;</li> <li>h. Incorporating long term management arrangements to ensure the longevity of mitigation measures</li> <li>i. Designing mitigation measures appropriate to the site conditions both at the time of construction and in the future by incorporating an appropriate allowance for climate change;</li> <li>j. Preventing the pollution of local ecosystems and groundwater with consideration of Groundwater Protection Zones.</li> </ul>	
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	<p>Sustainable Drainage Systems</p> <p>3. Where feasible, sustainable drainage systems should be incorporated into (i) all major developments or (ii) developments involving a net increase of 3 or more dwellings or 0.25ha in size within Areas of Critical Drainage, as identified on the policies map. They should:</p> <ul style="list-style-type: none"> <li>a. Be designed as an integral part of the development;</li> <li>b. Ensure that surface run-off is managed so as not to increase on- and off-site flood risk;</li> <li>c. Follow the surface water hierarchy, discharging surface water to watercourses/sewers at pre-development greenfield run-off rates on all greenfield sites and brownfield sites within Areas of Critical Drainage and as close to greenfield rates as feasible in all other locations;</li> <li>d. Seek opportunities to incorporate water quality, biodiversity and amenity enhancements and additional green infrastructure as part of a drainage solution; and,</li> <li>e. Ensure that there is no increased risk of pollution to local ecosystems and groundwater, with consideration of Groundwater Protection Zones.</li> </ul>	
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	<p>4. Sustainable drainage systems should be considered and are encouraged in all developments.</p>	
<p>Draft Policy INF4: Community Facilities</p>	<p>1. The provision of new or improved community facilities or services will be supported where the proposed development is in accordance with other relevant policies in the plan, and subject to the following additional criteria:</p> <ul style="list-style-type: none"> <li>a. The facility would meet an identified need;</li> <li>b. It is of a suitable scale to meet the need and is flexible and adaptable so that it can be utilised by a variety of community groups;</li> <li>c. The site is accessible to the community it is intended to serve by public transport, walking and cycling; and,</li> <li>d. The site has sufficient parking to ensure there is not significant on-street parking.</li> </ul> <p>2. The loss of sites and premises used for community facilities or services, leisure or cultural activities will be resisted unless:</p> <ul style="list-style-type: none"> <li>a. The proposal is supported by evidence that demonstrates that: <ul style="list-style-type: none"> <li>i. There is no reasonable prospect of the existing use or any other community use continuing;</li> </ul> </li> </ul>	<p>Draft Policy INF4 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 16.14, 16.16 and 17.10) as forming part of the local policy context for the Project. However, the Project proposals within MVDC's jurisdiction do not relate to new, improved or the loss of community facilities and therefore Draft Policy INF4 is not of relevance to the Project.</p>

	<ul style="list-style-type: none"> <li>ii. An alternative facility of equivalent or better quality or scale is available nearby or will be reprovided nearby or the use will be provided in a different way serving the same community; and,</li> <li>iii. The facility is of no particular value to the local community and its loss will not detrimentally affect the character and vitality of the areas; and,</li> <li>b. The site or premises has been actively marketed for 12-month period at a reasonable market value with a recognised agent for alternative community uses without a realistic, feasible or viable alternative use or occupier being identified, proportionate to the site or premises.</li> </ul>	
<p><b>Draft Policy INF6: Gatwick Airport</b></p>	<p><b>Development</b></p> <p>1. The Council supports the sustainable growth of Gatwick Airport as a single runway, two terminal airport. Development proposals must ensure the impacts of the operation on the environment are minimised and adequate supporting infrastructure is provided.</p> <p><b>Noise</b></p> <p>2. In areas near Gatwick Airport or otherwise adversely affected by aircraft noise, noise-sensitive development –</p>	<p>Draft Policy INF6 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 16.14, 16.16 and 17.10) as forming part of the local policy context for the Project.</p> <p><b>Section 3 of the Planning Statement [APP-245]</b> and the <b>Needs Case [APP-250]</b> for the Project set out the justification for</p>

	<p>particularly residential schemes – will be resisted unless adverse effects of the noise on occupants of the proposed development are shown to be sufficiently mitigated. Specific consideration should be given to the effects of noise on habitable rooms, including night time noise on bedrooms.</p> <p>3. Where aircraft noise levels would have a significant adverse effect on occupants of the proposed development, both within buildings and externally, noise-sensitive development will be resisted.</p> <p><b>Car Parking</b></p> <p>4. Proposals for additional off-airport car parking facilities or extensions to existing airport-related car parking sites will not be permitted.</p> <p><b>Safeguarded Land</b></p> <p>5. Land adjacent to Gatwick Airport identified on the Policies Map is safeguarded for aerodrome uses, as identified by the airport operator and supported by national policy.</p> <p><b>Aerodrome Safeguarding</b></p> <p>6. Development should have regard to aerodrome safeguarding requirements and will only be supported if it is consistent with the continued safe operation of Gatwick Airport.</p>	<p>new and improved infrastructure at Gatwick Airport.</p> <p>In respect of parts 2 and 3 of Draft Policy INF6, the Project has been fully assessed in terms of its potential noise effects in accordance with the requirements of policy. <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> and <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> discuss the findings of noise impact assessments arising from air, ground, construction and road traffic noise. An element of the Project’s proposed mitigation relates to a noise insulation scheme. Full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in <b>Section 8.21</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. These documents confirm that, subject to embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration environment.</p>
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		<p>The Project proposals within MVDC's administrative area does not relate to car parking facilities and therefore part 4 of Draft Policy INF6 is not applicable.</p> <p>With regards to parts 5 and 6 of Draft Policy INF6, the application does not relate to the expansion of utilisation of safeguarded land and therefore are not applicable to the Project.</p>
<b>Development Site Allocations</b>		
<p>Draft Development Site DS41: Land West of Reigate Road, Hookwood</p>	<p>Allocated for: RESIDENTIAL, HEALTH, COMMUNITY (including Early Years Education and Primary Health Care) AND PUBLIC OPEN SPACE</p> <p>Site Area (ha): 22.3ha</p> <p>Indicative capacity: 446 dwellings, at least 4 gypsy and traveller pitches OR 2 plots for travelling showpeople.</p> <p>Policy Map Designations: Former Green Belt, Inset Village, Designated Rural Area (affordable housing)</p> <p>Relevant Planning History: MO/2012/1621 Outline permission refused (and appeal dismissed) for 34 dwellings on part of site.</p>	<p>Draft Development Site DS41 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 16.15) as forming part of the local policy context for the Project. However, the Project proposals do not relate to this draft allocated site, which falls outside the Project boundary. As such, the policy for the Draft Development Site DS41 is not of relevance to the Project.</p>

	<p>In addition to meeting the policies in the plan, any developer of this site will be required to:</p> <ol style="list-style-type: none"> <li>1. Create a clearly defined boundary between the edge of the site and the Green Belt using physical features which are recognisable, likely to be permanent and consistent with the character of the surrounding environment.</li> <li>2. Retain the existing area of Priority Habitat woodland in the northern part of the site, with any required access route through this area located so as to minimise habitat disturbance and designed to maximise connectivity at canopy level and below ground.</li> <li>3. Survey the area identified as Priority Habitat (Traditional Orchard) in the west of the site to determine whether ground flora associated with the orchard has persisted, taking account of this in proposals for Biodiversity Net Gain in accordance with policy EN9.</li> <li>4. Incorporate enhanced green infrastructure comprising:             <ol style="list-style-type: none"> <li>a. Open space in line with the standards in policy EN10 and suitable for active recreation.</li> </ol> </li> </ol>	
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	<p>b. Linear open spaces and wooded areas, providing a network of publicly-accessible open space and connected to the existing public footpath network, incorporating a variety of habitats to support Biodiversity Net Gain in accordance with policy EN9.</p> <p>5. Provide equipped play space in accordance with the standards in Policy EN10.</p> <p>6. Establish a legal mechanism for long term management of green infrastructure and children’s play space, supporting both public access and an appropriate habitat management regime.</p> <p>7. Conserve and, where possible, enhance the setting of Grade II Listed Hookwood Manor.</p> <p>8. Provide community building(s), capable of accommodating early years education, need, as identified by Surrey County Council, primary health care services, as identified by the Surrey Downs Health and Care Partnership, and other Class E or F uses responding to the needs of the locality.</p> <p>9. Co-ordinate with the Surrey County Council Pupil Place Planning Team to ensure there are sufficient</p>	
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	<p>school places to meet projected needs within southern Mole Valley and the adjoining local authorities, taking account of other committed developments and phasing the development appropriately.</p> <p>10. Incorporate an area of approx. 0.2ha, with access to the highway and utilities connections, suitable for delivery of gypsy and traveller pitches OR an area of approx. 0.4ha suitable for delivery of a travelling showmen’s yard, in accordance with policy H5.</p> <p>11. Avoid built development within Flood Zones 2 and 3. Incorporate sustainable drainage measures to address and mitigate the risk of fluvial flooding, in accordance with Policy INF3 and site-specific guidance in the Level 2 Strategic Flood Risk Assessment.</p> <p>12. Liaise with Thames Water to ensure that necessary upgrades to off-site wastewater infrastructure can be delivered by Thames Water and that the occupation of the development is phased to align with delivery of necessary sewerage infrastructure.</p> <p>13. Provide vehicular access to Reigate Road and a secondary vehicular access connecting the site with</p>	
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	<p>the local highway network at a location which meets all relevant requirements of the Highways Authority with regard to accessibility and safety.</p> <p>14. Demonstrate through traffic modelling that the proposed development would not have any significant impact on the transport network in terms of capacity or congestion, both individually and cumulatively with other nearby developments, or that any such impact can be mitigated to an acceptable degree.</p> <p>15. Develop and implement a sustainable transport strategy for the site, with the objective of facilitating and encouraging use of travel options other than the private car for journeys to and from the proposed dwellings, to reduce growth in traffic at local congestion hotspots, including walking and cycling routes to link with new routes along the A217 and the Longbridge Roundabout.</p> <p>16. Safeguard the integrity of the Walton to Gatwick and Alton to Gatwick fuel pipelines.</p> <p>17. Incorporate measures to protect future residents from noise and other disturbance arising from Gatwick Business Park, and to enable continuation of the</p>	
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	<p>business park uses without being curtailed due to its proximity to residential development.</p> <p>18. Coordinate with developers of sites DS42, DS43 and DS44 to achieve a well-integrated development, delivering housing, public open space, community infrastructure, green infrastructure and landscaping, sustainable urban drainage, pedestrian and vehicle access in a co-ordinated manner across the sites.</p> <p>19. Provide water efficiency measures such as water butts, rainwater harvesting, water-saving appliances and fittings, with the aim of exceeding the requirements of policy H10, to reduce increased pressure on water supply infrastructure.</p> <p>Any developer of this site should, where possible:</p> <p>20. Work in partnership with Flood Risk Management bodies including Surrey County Council and the Environment Agency to design flood risk mitigation which co-ordinates with flood risk alleviation measures in the wider area around Hookwood, contributing to the reduction of flood peaks downstream.</p>	
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## 2 References

Mole Valley District Council (2000) Local Plan 2000 Saved Policies. Adopted 2000 and policies saved.

Mole Valley District Council (2009) Mole Valley Core Strategy. Adopted October 2009.

Mole Valley District Council (2024) Mole Valley Local Plan 2020 – 2039. Main Modifications Consultation 1<sup>st</sup> March to 23<sup>rd</sup> April 2024.

## 3 Glossary

Term	Description
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
GOS	Gatwick Open Setting
NRP	Northern Runway Project
oLEMP	Outline Landscape and Ecology Management Plan
RGC	Riverside Green Chain
SAC	Special Area of Conservation
SNCI	Site of Nature Conservation Importance
UOS	Urban Open Space

## Annex C: Local Planning Compliance Table – Horsham District Council

## 1 Local Planning Policy Compliance Tables – Annex C – Horsham District Council

### 1.1. Introduction

1.1.1 This document comprises a Local Planning Policy Compliance Table in respect of Horsham District Council (HDC) Development Plan, setting out local planning policies that are of relevance to the Northern Runway Project (NRP).

1.1.2 As made clear in the **Planning Statement** [\[APP-245\]](#), national policy provides the primary planning policy frameworks for the consideration and determination of the Project, however local planning policy can also be important and relevant. Where any conflicts arise between local and national policy, national planning policy would prevail. **Appendix C** [\[APP-248\]](#) of the Planning Statement contains Planning Policy Compliance Tables which identify and respond to national planning policy.

1.1.3 This document:

- identifies HDC’s local policies which may be relevant to the consideration of the Project, including any specific local policies related to Gatwick Airport; and
- provides a summary of the Project’s compliance with HDC’s policies, including cross references to key documents forming part of the DCO application where additional detailed information can be found.

1.1.4 This document has also been prepared taking account of the **Joint West Sussex Local Impact Report (LIR)** [\[REP1-068\]](#) prepared by HDC, together with Crawley Borough Council, West Sussex County Council and Mid Sussex District Council. This document identifies and responds to local policies referenced as relevant in the **Joint West Sussex LIR** [\[REP1-068\]](#).

1.1.5 In line with the **Joint West Sussex LIR** [\[REP1-068\]](#), the policy documents considered in this document comprise:

Adopted Development Plan documents

- Horsham District Planning Framework (2015 – 2031)

Emerging Development Plan documents

- Horsham District Local Plan 2023 – 2040 (Regulation 19)

- 1.1.6 The draft Horsham District Local Plan is considered to have limited weight given the early stage of its preparation in that it has recently finished a period of formal consultation on the Regulation 19 version, which closed on 1 March 2024.
- 1.1.7 The Project is not located within the administrative area of HDC.



Horsham District Planning Framework (2015 – 2031)		
Policy Reference	Policy Description	Compliance Commentary
<b>Policies for Growth and Change</b>		
<p>Policy 1: Strategic Policy: Sustainable Development</p>	<p>When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work pro-actively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.</p> <p>Planning applications that accord with the policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.</p> <p>Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission, unless material considerations indicate otherwise – taking into account whether:</p>	<p>Policy 1 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.22) as forming part of the policy context for the Project.</p> <p>In accordance with Policy 1, matters relating to sustainable development are considered in the <b>Planning Statement [APP-245]</b> and the <b>Sustainability Statement forming Appendix D of the Planning Statement</b> (Doc Ref. 7.1). Section 9 of the Planning Statement concludes in identifying that the Project is a sustainable development and would generate substantial benefits that outweigh the adverse impacts that have been identified. The Project</p>

	<ul style="list-style-type: none"> <li>Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or</li> <li>Specific policies in that Framework indicate that development should be restricted.</li> </ul>	<p>therefore complies with NPPF’s presumption in favour of sustainable development, as repeated by Policy 1.</p>
<p><b>Policy 2: Strategic Policy: Strategic Development</b></p>	<p>To maintain the district’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services and local employment, the spatial strategy to 2031 is to:</p> <ol style="list-style-type: none"> <li>7. Guide development form and provide access to strategic green space and recreational opportunities in and around the built-up urban areas.</li> <li>9. Identify existing sites of important employment use, and to safeguard their function through flexible policies and designation of Key Employment Areas, together with supporting the rural economy, to allow people the opportunity to work close to where they live.</li> <li>10. Provide for the varied housing needs of the community in terms of tenure, affordability, care and other support needs and the specific temporary and permanent needs of the Gypsy and Travellers and Travelling Showpeople.</li> </ol>	<p>The <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.22) sets out that parts 7, 9, 10 and 11 of Policy 2 are considered to be of relevance.</p> <p>In respect of parts 7 and 9, the Project is not located within the jurisdiction of HDC. As such, the Project does not propose works to strategic green space, recreational space or employment areas within Horsham District. Parts 7 and 9 of Policy 2 are not considered to be relevant to the Project.</p> <p>With regards to parts 10 and 11, the Project does not propose new</p>

	<p>11. Support the provision of rural housing which contributes towards the provision of affordable housing where there is a demonstrable need.</p>	<p>housing and these parts are therefore not relevant to the Project.</p>									
<p>Policy 3: Strategic Policy: Development Hierarchy</p>	<p>Development will be permitted within towns and villages which have defined built-up areas. Any infilling and redevelopment will be required to demonstrate that it is of an appropriate nature and scale to maintain characteristics and function of the settlement in accordance with the settlement hierarchy below:</p> <table border="1" data-bbox="465 692 1391 1335"> <thead> <tr> <th data-bbox="465 692 667 778">Settlement Type</th> <th data-bbox="667 692 1128 778">Settlement Characteristics and Function</th> <th data-bbox="1128 692 1391 778">Settlements</th> </tr> </thead> <tbody> <tr> <td data-bbox="465 778 667 1251">Main Town</td> <td data-bbox="667 778 1128 1251"> <p>Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.</p> </td> <td data-bbox="1128 778 1391 1251">Horsham</td> </tr> <tr> <td data-bbox="465 1251 667 1335">Small Towns and</td> <td data-bbox="667 1251 1128 1335"> <p>These are settlements with a good range of services and</p> </td> <td data-bbox="1128 1251 1391 1335">Billingshurst</td> </tr> </tbody> </table>	Settlement Type	Settlement Characteristics and Function	Settlements	Main Town	<p>Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.</p>	Horsham	Small Towns and	<p>These are settlements with a good range of services and</p>	Billingshurst	<p>The <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.22) refers to Policy 3 as of relevance.</p> <p>The Project relates to proposals at Gatwick Airport, an existing international airport located outside the jurisdiction of HDC. It does not relate to proposals in existing settlements in HDC or which would change the settlement hierarchy of the District, and therefore Policy 3 is not considered to be relevant to the Project.</p>
Settlement Type	Settlement Characteristics and Function	Settlements									
Main Town	<p>Settlement with a large range of employment, services and facilities and leisure opportunities, including those providing a district function. Strong social networks, with good rail and bus accessibility. The settlement meets the majority of its own needs and many of those in smaller settlements.</p>	Horsham									
Small Towns and	<p>These are settlements with a good range of services and</p>	Billingshurst									

	Larger Villages	facilities, strong community networks and local employment provision, Small Townsand Larger Villages Billingshurst Bramber and Upper Beeding together with reasonable rail and / or bus services. The settlements act as hubs for Broadbridge Heath smaller villages to meet their daily needs, but also have some reliance on larger settlements/ each other to meet some of their requirements	Bramber and Upper Beeding Broadbridge Heath Henfield Pulborough and Codmore Hill Southwater Steyning Storrington & Sullington*	
	Medium Villages	These settlements have a moderate level of services and facilities and community networks, together with some access to public transport. These settlements provide some day to day needs for residents, but rely on small market towns and larger	Ashington Barns Green Cowfold Partridge Green Rudgwick and Bucks Green Slinfold Warnham	

		settlements to meet a number of their requirements.	West Chiltington Village and Common	
	Smaller Villages	Villages with limited services, facilities, social networks but with good accessibility to larger settlements (e.g. road or rail) or settlements with some employment but limited services facilities or accessibility. Residents are reliant on larger settlements to access most of their requirements.	Christ's Hospital Lower Beeding Mannings Heath Rusper Small Dole Thakeham (The Street and High Bar Lane)	
	Unclassified settlements	Settlements with few or no facilities or social networks and limited accessibility, that are reliant on other villages and towns to meet the needs of residents.	All other settlements	
<p>*This does not include the hamlet of Sullington which is located entirely within the South Downs National Park.</p>				

<p>Policy 5: Strategic Policy: Horsham Town</p>	<p>To promote the prosperity of Horsham town and maintain and strengthen its role as the primary economic and cultural centre in the District, and the wider economic area. Development will be allowed within the built-up area of Horsham where it:</p> <ol style="list-style-type: none"> <li>1. Retains the town's key position as the main settlement within the District whilst protecting the unique characteristics of the town, including its historic character and high quality environment.</li> <li>2. Contributes to the provision of a range of services and facilities including those in arts, heritage and leisure that make the town self sustaining.</li> <li>3. Contributes to the economy of the town to support a vibrant high street and town centre that meets local and business demands, as well as supporting the wider economy including the Gatwick Diamond, and the economy of the south east including;             <ol style="list-style-type: none"> <li>a. the provision of a wide range of employment</li> <li>b. retaining and enhancing its unique retail mix to meet both independent and national retailers requirements</li> <li>c. contribution to the evening economy through the provision of a range of leisure uses.</li> </ol> </li> <li>4. Promotes high quality transport infrastructure which enables excellent pedestrian, cycling, bus and rail and</li> </ol>	<p>The <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.22) refers to Policy 5 as of relevance.</p> <p>The Project relates to proposals at Gatwick Airport, an existing international airport located outside the jurisdiction of HDC. It does not relate to proposals in Horsham Town and therefore Policy 5 is not considered to be relevant to the Project.</p>
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	<p>vehicle accessibility for residents, visitors and business employees; and</p> <ol style="list-style-type: none"> <li>5. Delivers a mix of residential properties which meet the needs of the population and contributes to quality modern living that is compatible with a town centre setting.</li> <li>6. Retains, enlarges or enhances the existing formal and informal greenspaces within the town.</li> </ol>	
<b>Economic Development</b>		
<p><b>Policy 7:</b> <b>Strategic Policy:</b> <b>Economic Growth</b></p>	<p>Sustainable employment development in Horsham district for the period up to 2031 will be achieved by;</p> <ol style="list-style-type: none"> <li>1. Allocating land for a high quality business park at Land North of Horsham.</li> <li>2. Redevelopment, regeneration, intensification and smart growth of existing employment sites.</li> <li>3. The formation and development of small, start-up and move-on businesses, as well as home working and home based businesses, by encouraging provision of small units through development proposals.</li> <li>4. Encouraging appropriate workspace and ICT infrastructure, such as high speed broadband, as an integral part of development, including residential</li> </ol>	<p>The <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.22) refers to Policy 7 as of relevance.</p> <p>The Project is anticipated to bring about significant benefits to the local economy, and therefore is compliant with the aspiration of Policy 7 in supporting economic growth. Further detail on this is set out in the Application, most notably <b>Sections 3 and 8.3</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>, <b>ES Chapter 17: Socio-Economics</b> <a href="#">[APP-042]</a>, <b>ES</b></p>

	<p>development to support flexible working, home working and businesses with the flexibility to operate anywhere.</p> <ol style="list-style-type: none"> <li>5. Retention of Key Employment Areas, for employment uses.</li> <li>6. Promotion of the district as an attractive place to stay and visit to increase the value of the tourism economy.</li> <li>7. Encouraging sustainable local employment growth through Neighbourhood Development Plans.</li> <li>8. Encouraging the expansion of higher education facilities related to research and development and employment training activity.</li> <li>9. Identifying additional employment areas to meet the need for appropriate new business activity.</li> </ol>	<p><b>Appendix 17.9.2: Local Economic Impact Assessment</b> <a href="#">[APP-200]</a> and the <b>Needs Case</b> <a href="#">[APP-250]</a>.</p> <p><b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> <a href="#">[APP-198]</a> sets out the Project’s measures to enable the local workforce to attain skills relevant to employment opportunities arising from airport growth and which will ensure that the local area benefits from new employment opportunities.</p>
<p><b>Policy 9: Employment Development</b></p>	<ol style="list-style-type: none"> <li>1. Development in the Key Employment Areas must not result in the overall loss of employment floorspace. Proposals for alternative uses within the Key Employment Areas will be allowed where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.</li> <li>2. Redevelopment of employment sites and premises outside Key Employment Areas, must demonstrate that the site/premises is no longer needed and/or viable for employment use.</li> </ol>	<p>The <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.22) refers to Policy 9 as of relevance, describing it as seeking to preserve the overall floorspace in existing Key Employment Areas.</p> <p>The Project is not located within the jurisdiction of HDC and therefore does not entail proposals to within or outside Key Employment Areas, in</p>



	<p>3. In the case of relocation from a Key Employment Area or other employment areas within a built-up area boundary, the proposal must demonstrate that the sequential approach has been applied, and that development will be in a suitable new location and will resolve any existing issues arising from badly sited uses. In addition an acceptable future use of the vacated site must be secured.</p> <p>4. Expansion of existing employment sites and premises within the built-up area boundary will be supported where the business requirements cannot be met within the existing site/premises, through acceptable on-site expansion or intensification; and that relocation to existing stock is not preferable.</p> <p>5. Provision of small, start-up and move-on business units will be supported to enable them to reach their fullest potential.</p>	<p>existing employment sites within the built-up area boundary or small business units in Horsham District. As such, Policy 9 is not considered to be relevant to the Project.</p>
<p><b>Policy 10: Rural Economic Development</b></p>	<p>Sustainable rural economic development and enterprise within the district will be encouraged in order to generate local employment opportunities and economic, social and environmental benefits for local communities.</p> <p>In the countryside, development which maintains the quality and character of the area, whilst sustaining its varied and productive social and economic activity will be supported in principle. Any</p>	<p>The <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 18.22) refers to Policy 10 as of relevance.</p> <p>The Project is not located within the jurisdiction of HDC and does not relate to rural employment provisions</p>

	<p>development should be appropriate to the countryside location and must:</p> <ol style="list-style-type: none"> <li>1. Contribute to the diverse and sustainable farming enterprises within the district or, in the case of other countryside-based enterprises and activities, contribute to the wider rural economy and/or promote recreation in, and the enjoyment of, the countryside; and either             <ol style="list-style-type: none"> <li>a. Be contained wherever possible within suitably located buildings which are appropriate for conversion or, in the case of an established rural industrial estate, within the existing boundaries of the estate; or</li> <li>b. Result in substantial environmental improvement and reduce the impact on the countryside particularly if there are exceptional cases where new or replacement buildings are involved. New buildings or development in the rural area will be acceptable provided that it supports sustainable economic growth towards balanced living and working communities and criteria a) has been considered first.</li> </ol> </li> <li>2. Demonstrate that car parking requirements can be accommodated satisfactorily within the immediate surrounds of the buildings, or an alternative, logical solution is proposed.</li> </ol>	<p>or rural economic development. As such, Policy 10 is not considered to be relevant to the Project.</p> <p>Commentary on the economic growth anticipated by the Project is set out against Policy 7 above. In particular, <b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> [<a href="#">APP-198</a>] sets out the Project’s measures to generate local employment opportunities for the local workforce in line with the aspirations of Policy 10.</p>
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	<p>Proposals for the conversion of rural buildings to business and commercial uses will be considered favourably over residential in the first instance.</p>	
<p><b>Policy 11: Tourism and Cultural Facilities</b></p>	<p>Measures which promote tourism and enhance local cultural facilities, including recreation based rural diversification, will be encouraged. Any development should be of a scale and type appropriate to the location and should increase the range, or improve the quality of accommodation, attraction or experiences for tourists, day visitors, business visitors, and residents in the District. Support will particularly be given to proposals which:</p> <ol style="list-style-type: none"> <li>1. Reinforce the local distinctiveness and improve existing facilities;</li> <li>2. Focuses major tourism and cultural facilities in Horsham town centre;</li> <li>3. Seek to ensure that facilities are available within the towns and villages in the district and are in keeping with their relationship with the urban area and countryside around them especially in and around the High Weald AONB and the South Downs National Park;</li> <li>4. Develop the opportunities associated with rural diversification and rural development initiatives, particularly where they assist farm diversification projects, benefit the</li> </ol>	<p>The <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 18.22) refers to Policy 11 as of relevance, describing it as reinforcing local distinctiveness and improving existing facilities, ensuring facilities are available in towns and villages, and do not result in the loss of a cultural resource.</p> <p>The Project is not located within the jurisdiction of HDC and does not entail proposals for tourism or cultural facilities in Horsham District. As such, Policy 11 is not considered to be relevant to the Project.</p>

	<p>local economy, or enable the retention of buildings contributing to the character of the countryside; and</p> <p>5. Do not result in the loss of a cultural resource.</p>	
<p><b>Policy 12: Strategic Policy: Vitality and Viability of Existing Retail Centres</b></p>	<p>Recognising the development hierarchy for the District, the hierarchy for the district’s town and village centres is established as follows:</p> <ul style="list-style-type: none"> <li>• Primary centre: Horsham town</li> <li>• Secondary centres: Billingshurst, Henfield, Pulborough, Southwater, Steyning and Storrington</li> <li>• Tertiary centres and outlying small retail units: Smaller village centres and shops</li> </ul> <p>The hierarchy of retail centres will be supported and enhanced through;</p> <ol style="list-style-type: none"> <li>1. Positive measures to improve Horsham town centre as the primary centre. The other town and village centres within the district will be encouraged to help sustain their roles in meeting needs and acting as a focus for a range of activities, including retail, leisure, and recreation appropriate to the scale and character of the centre.</li> <li>2. Promotion and encouragement of activities in town and village centres so they continue to be the prime focus for community life in the district by:</li> </ol>	<p>The <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.22) refers to Policy 12 as of relevance, describing it as setting out a hierarchy of retail centres across the District and the means by which development should support their viability and vitality.</p> <p>The Project is not located within the jurisdiction of HDC and does not entail proposals for retail centres in Horsham District. As such, Policy 12 is not considered to be relevant to the Project.</p>

	<ul style="list-style-type: none"> <li>a. Maintaining a diverse range and choice of suitable uses including retail, leisure, entertainment, sports and recreation, arts, culture, business and commercial uses as well as residential use.</li> <li>b. A well designed and maintained attractive public realm.</li> <li>c. Promotions, outdoor events and entertainment and markets.</li> <li>d. A choice of accessible and affordable means of travel including public transport and adequate and convenient car parking.</li> <li>e. Respect for historic character and good urban design principles.</li> <li>f. A convenient, cohesive and concentrated primary area which contains a high proportion of retail (A1) uses where this has reasonable prospects for remaining viable.</li> <li>g. In the larger centres encouragement for variety in the “offer” which for Horsham town centre has meant the identification of distinct “quarters” that define character and ambiance.</li> <li>h. For the secondary areas defined within larger town centres a wider range of class A uses as well as other use classes can be located.</li> </ul>	
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	<ul style="list-style-type: none"> <li>i. Suitable residential use in existing older and new buildings.</li> <li>j. A vibrant and regulated evening economy compatible with adjoining uses.</li> <li>k. Encouragement in innovation and support for improvements in retailing activity.</li> </ul>	
<b>Housing</b>		
<b>Policy 15: Strategic Policy: Housing Provision</b>	<p>Provision is made for the development of at least 16,000 homes and associated infrastructure within the period 2011-2031, at an average of 800 homes per annum. This figure will be achieved by:</p> <ul style="list-style-type: none"> <li>1. Housing completions for the period 2011 – 2015;</li> <li>2. Homes that are already permitted or agreed for release;</li> <li>3. Strategic Sites: <ul style="list-style-type: none"> <li>a. At least 2,500 homes at Land North of Horsham</li> <li>b. Around 600 homes at Land West of Southwater</li> <li>c. Around 150 homes at Land South of Billingshurst</li> </ul> </li> <li>4. The provision of at least 1500 homes throughout the district in accordance with the settlement hierarchy, allocated through Neighbourhood Planning.</li> <li>5. 750 windfall units</li> </ul>	<p>The <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 18.22) refers to Policies 15, 16 and 19 as being of relevance.</p> <p>The Project is not located within the jurisdiction of HDC and does not propose new housing or residential caravans. As such, Policies 15, 16 and 19 are not relevant to the Project.</p> <p>Notwithstanding this, the application has undertaken an assessment of the potential demand for housing as a result of the Project in <b>ES</b></p>

<p>Policy 16: Strategic Policy: Meeting Local Housing Needs</p>	<ol style="list-style-type: none"> <li>1. Development should provide a mix of housing sizes, types and tenures to meet the needs of the district's communities as evidenced in the latest Strategic Housing Market Assessment in order to create sustainable and balanced communities.</li> <li>2. The appropriate mix of different housing types and sizes for each site will depend upon the established character and density of the neighbourhood and the viability of the scheme.</li> <li>3. In order to meet the proven needs of people who are not able to compete in the general housing market, all residential developments of 5 dwellings or more will be expected to include an appropriate proportion of affordable homes in accordance with the following thresholds and targets:</li> <li>4. On sites providing 15 or more dwellings, or on sites over 0.5 hectares, the Council will require 35% of dwellings to be affordable.</li> <li>5. On sites providing between 5 and 14 dwellings, the Council will require 20% of dwellings to be affordable or where on-site provision is not achievable a financial contribution equivalent to the cost of the developer of providing the units on site. 4. If a development site is subdivided so as to create two or more separate development schemes one or more of which falls below the relevant</li> </ol>	<p><b>Appendix 17.9.3: Assessment of Population and Housing Effects [APP-201]</b>, including an assessment of potential impacts on affordable housing is in <b>Section 7</b>. This concludes that there is sufficient housing and labour market growth planned to accommodate increased demand for workers.</p>
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	<p>threshold, the Council will seek an appropriate level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the site.<sup>5</sup>The Council will support schemes being brought forward through Neighbourhood Plans.</p> <p><i>Implementation</i></p> <p>The mechanisms for calculating financial contributions in lieu of on site provision will be set out in separate guidance.</p> <p>The affordable housing thresholds and targets will apply to all new homes that are being proposed.</p> <p>In seeking affordable housing provision the Council will assess each schemes viability, including assessing the overall mix of affordable unit size and tenure, to ensure they meet local need as evidenced by the latest SHMA.</p>	
<p><b>Policy 19: Park Homes and Residential Caravan Sites</b></p>	<p>Proposals for the provision of park homes/residential caravans to meet a local district wide housing need will be supported provided that the development:</p> <ol style="list-style-type: none"> <li>1. Is provided to meet a local housing need; there will be a requirement for them to be marketed in the first instance</li> </ol>	



	<p>for a reasonable period of time to residents of Horsham district;</p> <ol style="list-style-type: none"> <li>2. The park homes/residential caravans shall be used for permanent accommodation; and</li> <li>3. No significant barriers exist in terms of flooding, poor drainage and poor ground stability.</li> </ol> <p>Subsequent proposals for permanent housing development on the site or use as holiday accommodation will not be supported whilst the need for such accommodation exists.</p> <p>Conversion of existing holiday accommodation will have to meet the above criteria and continuous use of the site must not cause unacceptable harm to the amenity of occupiers/users of nearby property and land, or damage to the environment.</p>	
<b>Strategic Allocations</b>		
<p>Policies SD1-SD11</p>	<p>The <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 18.22) refers to Strategic Policies SD1 to SD11 as being of relevance.</p> <p>The Project is not located within the jurisdiction of HDC and does not relate to the Strategic Allocated sites of Land North of Horsham, Southwater Strategic site or Land South of Billingshurst. As such, Policies SD1 to SD11 are not relevant to the Project.</p>	

**Conserving and Enhancing the Natural and Built Environment**
**Policy 24:  
Strategic Policy:  
Environmental  
Protection**

The high quality of the district’s environment will be protected through the planning process and the provision of local guidance documents. Taking into account any relevant Planning Guidance Documents, developments will be expected to minimise exposure to and the emission of pollutants including noise, odour, air and light pollution and ensure that they:

1. Address land contamination by promoting the appropriate re-use of sites and requiring the delivery of appropriate remediation;
2. Are appropriate to their location, taking account of ground conditions and land instability;
3. Maintain or improve the environmental quality of any watercourses, groundwater and drinking water supplies, and prevents contaminated run-off to surface water sewers;
4. Minimise the air pollution and greenhouse gas emissions in order to protect human health and the environment;
5. Contribute to the implementation of local Air Quality Action Plans and do not conflict with its objectives;
6. Maintain or reduce the number of people exposed to poor air quality including odour. Consideration should be given to development that will result in new public exposure,

Policy 24 is listed in the **Joint West Sussex Local Impact Report [REP1-068]** (pages 150 to 156, 186 to 196 and paras 13.29 and 15.24) as forming part of the policy context for the Project.

The Project is not located within the jurisdiction of HDC and therefore Parts 1 and 2 are not considered to be relevant to the Project.

In respect of Part 3 of Policy 24, **ES Chapter 11: Water Environment [APP-036]** provides an assessment of the Project’s potential effects on water quality, flood risk, groundwater, wastewater and water supply, supported by detailed assessments in **ES Appendices 11.9.3 to 11.9.8 [APP-144 to APP-151]**. As explained in Section 8.13 of the Planning Statement, the Project will not result

	<p>particularly where vulnerable people (e.g. the elderly, care homes or schools) would be exposed to the areas of poor air quality; and</p> <p>7. Ensure that the cumulative impact of all relevant committed developments is appropriately assessed.</p>	<p>in any unacceptable levels of water pollution or any significant impacts on water resources. A number of measures are proposed to mitigate, manage and monitor water quality and groundwater quality, and best practice measures would be put in place during construction as set out in the Water Management Plan [X]. It is therefore considered that the Project complies with Part 3 of Policy 24.</p> <p>In respect of Part 4 of Policy 24, <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> provides an assessment of potential effects on air quality as a result of the Project and <b>ES Chapter 16: Greenhouse Gases</b> <a href="#">[APP-041]</a> provides an assessment of the potential effects of greenhouse gas emissions associated with the Project. This is underpinned by <b>ES Appendix 5.4.2 Carbon Action Plan</b> <a href="#">[APP-091]</a> sets out outcomes that</p>
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		<p>GAL is committing to deliver for key airport operational and construction emissions sources. No significant effects on air quality are identified as a result of the Project and therefore the Project complies with Parts 4 to 6 of Policy 24.</p> <p><b>ES Chapter 20: Cumulative Effects and Inter-Relationships</b> <a href="#">[APP-045]</a> provides an assessment of the potential effects arising from the Project that may occur at the same time as effects from other development on environmental receptors and combined effects on environmental topics assessed through the EIA process on single receptors or receptor groups. ES Chapter 20 satisfies the requirements of Part 7 of Policy 24 in having undertaken a cumulative assessment.</p>
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<p>Policy 25: Strategic Policy: The Natural Environment and Landscape Character</p>	<p>The Natural Environment and landscape character of the District, including the landscape, landform and development pattern, together with protected landscapes and habitats will be protected against inappropriate development. The Council will support development proposals which:</p> <ol style="list-style-type: none"> <li>1. Protects, conserves and enhances the landscape and townscape character, taking into account areas identified as being of landscape importance, the individual settlement characteristics, and maintains settlement separation.</li> <li>2. Maintain and enhances the Green Infrastructure Network and addresses any identified deficiencies in the District.</li> <li>3. Maintains and enhances the existing network of geological sites and biodiversity, including safeguarding existing designated sites and species, and ensures no net loss of wider biodiversity and provides net gains in biodiversity where possible.</li> <li>4. Conserve and where possible enhance the setting of the South Downs National Park.</li> </ol>	<p>Policy 25 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (pages 150 to 156) as forming part of the policy context for the Project.</p> <p>In respect of Part 1 of Policy 25, the assessment of the Project’s impact on the surrounding landscape character is assessed in <b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> and which has informed the design of the Project. The application is supported by <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (oLEMP)</b> (Doc Ref. 5.3) which sets out the overarching vision for the landscape proposals and management of green infrastructure in the Project. The oLEMP takes a positive approach to developing an overarching landscape strategy and accompanying landscape principles specific to each</p>
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		<p>zone or particular development feature, to inform the detailed Landscape and Ecology Management Plans.</p> <p>Part 2 of Policy 25 is not relevant to the Project in that it does not entail development in HDC’s jurisdiction and therefore does not entail proposals to the District’s green infrastructure network or address any deficiencies.</p> <p>In respect of Part 3 of Policy 25, the impact of the Project on ecology has been fully assessed through the Environmental Impact Assessment process, the results of which are set out in <b>ES Chapter 9: Ecology And Nature Conservation</b> [<a href="#">APP-034</a>]. The assessment process was based on detailed ecology surveys undertaken over a period of four years (2019 to 2023), the results of which are set out in the various <b>Chapter 9</b></p>
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		<p><b>appendices</b> [APP-123 to APP-133]. The assessment process followed good practice guidelines and considered all Important Ecological Resources identified. This includes designated sites, habitats and flora/fauna. No residual significant adverse effects were identified with the overall conclusion of the assessment that the Project would have a net benefit for ecology, as demonstrated by the circa 20% Biodiversity Net Gain, as set out in <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> (Doc Ref. 5.3).</p> <p>With regards to Part 4 of Policy 25 and in respect of the South Downs National Park, <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> [APP-033] provides an assessment of the Project’s impacts on landscape and townscape character and visual amenity. This includes an assessment of the</p>
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		<p>impact of noise (amongst other factors) on the perception of tranquility for receptors within AONBs and the South Downs National Park.</p> <p>Collectively, these assessments and control documents demonstrate compliance with Policy 25.</p>
<p>Policy 30: Protected Landscapes</p>	<ol style="list-style-type: none"> <li>1. The natural beauty and public enjoyment of the High Weald AONB and the adjoining South Downs National Park will be conserved and enhanced and opportunities for the understanding and enjoyment of their special qualities will be promoted. Development proposals will be supported in or close to protected landscapes where it can be demonstrated that there will be no adverse impacts to the natural beauty and public enjoyment of these landscapes as well as any relevant cross boundary linkages.</li> <li>2. Proposals should have regard to any management plans for these areas and must demonstrate:             <ol style="list-style-type: none"> <li>a. How the key landscape features or components of natural beauty will be conserved and enhanced. This includes maintaining local distinctiveness, sense of place and setting of the protected landscapes, and if</li> </ol> </li> </ol>	<p>Policy 30 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 8.29) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> [<a href="#">APP-033</a>] and <b>Section 8.15 of the Planning Statement</b> [<a href="#">APP-245</a>] provides an assessment of the Project’s potential effects upon AONBs, including the assessment of effects on the High Weald AONB special qualities and landscape character. ES Chapter 8 (Section 8.6)</p>



	<p>necessary providing mitigation or compensation measures.</p> <ul style="list-style-type: none"> <li>b. How the public enjoyment of these landscapes will be retained.</li> <li>c. How the proposal supports the economy of the protected landscape and will contribute to the social wellbeing of the population who live and work in these areas.</li> </ul> <p>3. In the case of major development proposals in or adjoining protected areas, applicants will also be required to demonstrate why the proposal is in the public interest and what alternatives to the scheme have been considered.</p>	<p>has had regard to the AONB Management Plans, in accordance with Part 2 of Policy 30.</p> <p><b>ES Chapter 8</b> <a href="#">[APP-033]</a> also includes an assessment of effects on the perception of tranquillity within nationally designated landscapes. The assessment concludes that an increase of up to 20% in overflights compared to the future baseline in 2032 would result in minor adverse effects on perception of tranquillity, which is not significant. The special qualities that people living within and visiting nationally designated landscape (such as Surrey Hills AONB) experience, including distant scenic views and the landscape's relative tranquillity and dark skies, whilst affected to some extent as a result of the Project, would still be positive qualities that would be apparent.</p>
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		<p>Mitigation and enhancement measures are adopted as part of the Project, detailed in <b>Section 8.8 of ES Chapter 8</b> <a href="#">[APP-033]</a>. This includes the provision of vegetation retention strategies for all elements of the Project coinciding with existing significant vegetation, secured through <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (LEMP)</b> (Doc Ref. 5.3) and subsequent LEMPs, to ensure that significant vegetation is retained to protect the natural beauty and setting of designated AONBs. The oLEMP confirms that the Project will not prejudice the conservation and enhancement of the natural beauty and setting of the High Weald AONB, and therefore there is no conflict with Part 1 of Policy 30.</p> <p>Part 3 of Policy 30 is not applicable to the Project, given it is not within or adjoining to a protected area.</p>
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<p><b>Policy 31: Green Infrastructure and Biodiversity</b></p>	<ol style="list-style-type: none"> <li>1. Development will be supported where it can demonstrate that it maintains or enhances the existing network of green infrastructure. Proposals that would result in the loss of existing green infrastructure will be resisted unless it can be demonstrated that new opportunities will be provided that mitigates or compensates for this loss, and ensures that the ecosystem services of the area are retained.</li> <li>2. Development proposals will be required to contribute to the enhancement of existing biodiversity, and should create and manage new habitats where appropriate. The Council will support new development which retains and /or enhances significant features of nature conservation on development sites. The Council will also support development which makes a positive contribution to biodiversity through the creation of green spaces, and linkages between habitats to create local and regional ecological networks.</li> <li>3. Where felling of protected trees is necessary, replacement planting with a suitable species will be required.</li> <li>4. a) Particular consideration will be given to the hierarchy of sites and habitats in the district as follows:             <ol style="list-style-type: none"> <li>i. Special Protection Area (SPA) and Special Areas of Conservation (SAC)</li> <li>ii. Sites of Special Scientific Interest (SSSIs) and National Nature Reserves (NNRs)</li> </ol> </li> </ol>	<p>Policy 31 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.24) as forming part of the policy context for the Project.</p> <p>Parts 1 and 2 of Policy 31 are not applicable to the Project, given it is not located within HDC jurisdiction and therefore does not relate to the maintenance, enhancement or loss of green infrastructure and biodiversity in the District. Similarly, Part 3 is not applicable as the Project does not propose the felling of protected trees in Horsham District.</p> <p>In respect of Parts 4 and 5 of Policy 31, <b>ES Chapter 9: Ecology and Nature Conservation [APP-034]</b> provides an assessment of the Project’s effects on international, national, regional/county and local designated sites, supported by <b>ES Appendix 9.9.1: Habitat</b></p>
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	<ul style="list-style-type: none"> <li>iii. Sites of Nature Conservation Importance (SNCIs), Local Nature Reserves (LNRs) and any areas of Ancient woodland, local geodiversity or other irreplaceable habitats not already identified in i &amp; ii above.</li> <li>b) Where development is anticipated to have a direct or indirect adverse impact on sites or features for biodiversity, development will be refused unless it can be demonstrated that: <ul style="list-style-type: none"> <li>i. The reason for the development clearly outweighs the need to protect the value of the site; and,</li> <li>ii. That appropriate mitigation and compensation measures are provided.</li> </ul> </li> </ul> <p>5. Any development with the potential to impact Arun Valley SPA or the Mens SAC will be subject to a HRA to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the HRA of this plan.</p>	<p><b>Regulations Assessment Report</b> [APP-134 to APP-135]. The designated sites within the search areas are shown on <b>ES Appendix 9.6.1: Ecological Desk Study</b> [<a href="#">APP-123</a>] and described in <b>Section 9.6</b> of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>].</p> <p>The Project’s embedded and good practice mitigation measures are detailed in <b>Section 9.8</b> of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>], together with detailed ecological mitigation strategies in relation to specific species contained in <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys</b> [APP-131 to APP-132] and <b>ES Appendix 9.6.4 Confidential Badger Survey</b> [<a href="#">APP-133</a>]. The measures detailed within <b>Section 9.8</b> of <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] have been designed to</p>
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		<p>ensure that impacts of the Project on ecological receptors are avoided, reduced or mitigated where effects are unavoidable.</p> <p>The documents referenced above, ES Chapter 9 and its supporting Appendices demonstrate that the Project does not conflict with Parts 4 and 5 of Policy 31.</p>
<p><b>Policy 33: Development Principles</b></p>	<p>In order to conserve and enhance the natural and built environment developments shall be required to:</p> <ol style="list-style-type: none"> <li>1. Make efficient use of land, and prioritise the use of previously developed land and buildings whilst respecting any constraints that exist;</li> <li>2. Ensure that it is designed to avoid unacceptable harm to the amenity of occupiers/users of nearby property and land, for example through overlooking or noise, whilst having regard to the sensitivities of surrounding development;</li> <li>3. Ensure that the scale, massing and appearance of the development is of a high standard of design and layout and where relevant relates sympathetically with the built</li> </ol>	<p>Policy 33 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 14.47) as forming part of the policy context for the Project.</p> <p>The Project is not located in HDC’s jurisdiction and therefore does not relate to features of natural and built development in the District.</p>

	<p>surroundings, landscape, open spaces and routes within and adjoining the site, including any impact on the skyline and important views;</p> <p>4. Are locally distinctive in character, respect the character of the surrounding area (including its overall setting, townscape features, views and green corridors) and, where available and applicable, take account of the recommendations/policies of the relevant Design Statements and Character Assessments;</p> <p>5. Use high standards of building materials, finishes and landscaping; and includes the provision of street furniture and public art where appropriate;</p> <p>6. Presume in favour of the retention of existing important landscape and natural features, for example trees, hedges, banks and watercourses. Development must relate sympathetically to the local landscape and justify and mitigate against any losses that may occur through the development; and,</p> <p>7. Ensure buildings and spaces are orientated to gain maximum benefit from sunlight and passive solar energy, unless this conflicts with the character of the surrounding townscape, landscape or topography where it is of good quality.</p>	
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	<p>Proposals will also need to take the following into account where relevant:</p> <ol style="list-style-type: none"> <li>8. Incorporate where appropriate convenient, safe and visually attractive areas for the parking of vehicles and cycles, and the storage of bins/recycling facilities without dominating the development or its surroundings;</li> <li>9. Incorporate measures to reduce any actual or perceived opportunities for crime or antisocial behaviour on the site and in the surrounding area; and create visually attractive frontages where adjoining streets and public spaces, including appropriate windows and doors to assist in the informal surveillance of public areas by occupants of the site;</li> <li>10. Contribute to the removal of physical barriers; and,</li> <li>11. Make a clear distinction between the public and private spaces within the site.</li> </ol>	
<b>Climate Change</b>		
<p><b>Policy 35:</b> <b>Strategic Policy:</b> <b>Climate Change</b></p>	<p>Development will be supported where it makes a clear contribution to mitigating and adapting to the impacts of climate change and to meeting the district's carbon reduction targets as set out in the Council's Acting Together on Climate Change Strategy, 2009.</p>	<p>Policy 35 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (paras 15.24 and 16.33) as forming part of the policy context for the Project.</p>

	<p>Measures which should be used to mitigate the effects of climate change include;</p> <ol style="list-style-type: none"> <li>1. Reduced energy use in construction;</li> <li>2. Improved energy efficiency in new developments, including influencing the behaviour of occupants to reduce energy use;</li> <li>3. The use of decentralised, renewable and low carbon energy supply systems;</li> <li>4. The use of patterns of development which reduce the need to travel, encourage walking and cycling and include good accessibility to public transport and other forms of sustainable transport; and</li> <li>5. Measures which reduce the amount of biodegradable waste sent to landfill.</li> </ol> <p>Development must be designed so that it can adapt to the impacts of climate change, reducing vulnerability, particularly in terms of flood risk, water supply and changes to the district's landscape. Developments should adapt to climate change using the following measures:</p> <ol style="list-style-type: none"> <li>1. Provision of appropriate flood storage capacity in new building development;</li> </ol>	<p><b>ES Chapter 16: Greenhouse Gases</b> [<a href="#">APP-041</a>] provides an assessment of the potential effects of greenhouse gas emissions associated with the Project. This is underpinned by <b>ES Appendix 5.4.2 Carbon Action Plan</b> [<a href="#">APP-091</a>] setting out outcomes that GAL is committing to deliver for key airport operational and construction emissions sources.</p> <p>The application is also accompanied by a series of design principles, set out in the <b>Design and Access Statement Appendix 1</b> (Doc Ref. 7.1), which the detailed design is required to be in accordance with. This includes design principles relating to the drainage system, site layout and green infrastructure provisions.</p> <p>Notwithstanding this, the Project is not located with HDC's jurisdiction</p>
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	<ol style="list-style-type: none"> <li>2. Use of green infrastructure and dual use SuDS to help absorb heat, reduce surface water runoff, provide flood storage capacity and assist habitat migration;</li> <li>3. Use of measures which promote the conservation of water and/or grey water recycling; and</li> <li>4. Use of site layout, design measures and construction techniques that provide resilience to climate change (opportunities for natural ventilation and solar gain).</li> </ol> <p>If it is not possible to incorporate the adaption and mitigation measures proposed, an explanation should be provided as to why this is the case.</p>	<p>and therefore does not relate to climate change measures for developments in Horsham District.</p>
<p>Policy 36: Appropriate Energy Use</p>	<p><i>Energy hierarchy</i> All development will be required to contribute to clean, efficient energy in Horsham based on the following hierarchy:</p> <ol style="list-style-type: none"> <li>1. Lean – use less energy – e.g. through demand reduction</li> <li>2. Clean – supply energy efficiently – e.g. through heat networks</li> <li>3. Green – use renewable energy sources</li> </ol> <p><i>District Heating and Cooling</i> Commercial and residential developments in Heat Priority Areas or the strategic development locations will be expected to connect</p>	<p>Policy 36 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.24) as forming part of the policy context for the Project.</p> <p>The Project is not located with HDC’s jurisdiction and therefore does not relate to energy use measures for developments in Horsham District.</p>

	<p>to district heating networks where they exist using the following hierarchy, or incorporate the necessary infrastructure for connection to future network.</p> <p>Development should demonstrate that the heating and cooling systems have been selected in accordance with the following heating and cooling hierarchy;</p> <ol style="list-style-type: none"> <li>1. Connection to existing (C)CHP distribution networks</li> <li>2. Site wide renewable (C)CHP</li> <li>3. Site wide gas-fired (C)CHP</li> <li>4. Site wide renewable community heating/cooling</li> <li>5. Site wide gas-fired community heating/cooling</li> <li>6. Individual building renewable heating</li> <li>7. Individual building heating, with the exception of electric heating</li> </ol> <p>All (C)CHP must be of a scale and operated to maximise the potential for carbon reduction. Where site-wide (C)CHP is proposed, consideration must be given to extending the network to adjacent sites.</p> <p><i>Energy Statements</i></p>	
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	<p>All applications for residential or commercial development must include an Energy Statement demonstrating and quantifying how the development will comply with the Energy Hierarchy.</p> <p>Developments in Heat Priority Areas and strategic developments should demonstrate and quantify how the development will comply with the heating and cooling hierarchy. Horsham District Council will work proactively with applicants on major developments to ensure these requirements are met.</p> <p><i>Renewable energy schemes</i> The Council will permit schemes for renewable energy (e.g. solar) where they do not have a significant adverse effect on landscape and townscape character, biodiversity, heritage or cultural assets or amenity value. Community initiatives which seek to deliver renewable and low carbon energy will be encouraged.</p>	
<p><b>Policy 37: Sustainable Construction</b></p>	<p>Proposals must seek to improve the sustainability of development. To deliver sustainable design, development should incorporate the following measures where appropriate according to the type of development and location:</p> <ol style="list-style-type: none"> <li>1. Maximise energy efficiency and integrate the use of decentralised, renewable and low carbon energy;</li> <li>2. Limit water use to 110 litres/person/day;</li> </ol>	<p>Policy 37 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.24) as forming part of the policy context for the Project.</p> <p>The Project is not located with HDC's jurisdiction and therefore does not</p>

	<ol style="list-style-type: none"> <li>3. Use design measures to minimise vulnerability to flooding and heatwave events;</li> <li>4. Be designed to encourage the use of natural lighting and ventilation;</li> <li>5. Be designed to encourage walking, cycling, cycle storage and accessibility to sustainable forms of transport;</li> <li>6. Minimise construction and demolition waste and utilise recycled and low-impact materials;</li> <li>7. Be flexible to allow future modification of use or layout, facilitating future adaptation, refurbishment and retrofitting;</li> <li>8. Incorporate measures which enhance the biodiversity value of development.</li> </ol> <p>All new development will be required to provide satisfactory arrangements for the storage of refuse and recyclable materials as an integral part of design.</p> <p>New homes and workplaces should include the provision of high-speed broadband access and enable provision of future technologies where available.</p>	<p>relate to sustainable construction measures for developments in Horsham District.</p>
<p><b>Policy 38:</b> <b>Strategic Policy:</b> <b>Flooding</b></p>	<ol style="list-style-type: none"> <li>1. Development proposals will follow a sequential approach to flood risk management, giving priority to development sites with the lowest risk of flooding and making required</li> </ol>	<p>Policy 38 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.24) as forming</p>

	<p>development safe without increasing flood risk elsewhere. Development proposals will;</p> <ol style="list-style-type: none"> <li>a. take a sequential approach to ensure most vulnerable uses are placed in the lowest risk areas.</li> <li>b. avoid the functional floodplain (Flood zone 3b) except for water-compatible uses and essential infrastructure.</li> <li>c. only be acceptable in Flood Zone 2 and 3 following completion of a sequential test and exceptions test if necessary.</li> <li>d. require a site-specific Flood Risk Assessments for all developments over 1 hectare in Flood Zone 1 and all proposals in Flood Zone 2 and 3.</li> </ol> <p>2. Comply with the tests and recommendations set out in the Horsham District Strategic Flood Risk Assessment (SFRA).</p> <p>3. Where there is the potential to increase flood risk, proposals must incorporate the use of sustainable drainage systems (SuDS) where technically feasible, or incorporate water management measures which reduce the risk of flooding and ensure flood risk is not increased elsewhere.</p>	<p>part of the policy context for the Project.</p> <p>The Project is not located with HDC's jurisdiction. As such, it does not entail development in flood risk areas in the District or relate to drainage measures in new developments in Horsham District.</p>
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	<ol style="list-style-type: none"> <li>4. Consider the vulnerability and importance of local ecological resources such as water quality and biodiversity when determining the suitability of SuDS. New development should undertake more detailed assessments to consider the most appropriate SuDS methods for each site. Consideration should also be given to amenity value and green infrastructure.</li> <li>5. Utilise drainage techniques that mimic natural drainage patterns and manage surface water as close to its source as possible will be required where technically feasible.</li> <li>6. Be in accordance with the objective of the Water Framework Directive, and accord with the findings of the Gatwick Sub Region Water Cycle Study in order to maintain water quality and water availability in rivers and wetlands and wastewater treatment requirements.</li> </ol>	
<b>Infrastructure, Transport and Healthy Communities</b>		
<b>Policy 40: Sustainable Transport</b>	<p>There is commitment to developing an integrated community connected by a sustainable transport system. In order to manage the anticipated growth in demand for travel, development proposals which promote an improved and integrated transport network, with a re-balancing in favour of non-car modes as a means of access to jobs, homes, services and facilities, will be encouraged and supported.</p>	<p>Policy 40 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.24) as forming part of the policy context for the Project.</p>

	<p>Development will be supported if it:</p> <ol style="list-style-type: none"> <li>1. Is appropriate and in scale to the existing transport infrastructure, including public transport.</li> <li>2. Maintains and improves the existing transport system (road, rail, cycle).</li> <li>3. Is integrated with the wider network of routes, including public rights of way and cycle paths.</li> <li>4. Includes opportunities for sustainable transport which reduce the need for major infrastructure and cut carbon emissions.</li> <li>5. Is located in areas where there are, or will be a choice in the modes of transport available.</li> <li>6. Minimises the distance people need to travel and minimises conflicts between traffic, cyclists and pedestrians.</li> <li>7. Delivers better local bus and rail services in partnership with operators and increasing opportunities for interchange between the public transport network and all other modes of transport.</li> <li>8. Develops innovative and adaptable approaches to public transport in the rural areas of the district.</li> </ol>	<p>The <b>Transport Assessment</b> [<a href="#">APP-258</a>] and <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>] provide the assessment of the potential transport impacts of the Project. <b>Section 12.6</b> of <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>] explains the existing transport network, public transport routes and cycling and walking network in relation to the Project, and <b>Section 12.8</b> sets out the mitigation and enhancement measures proposed as part of the Project to increase the use of public transport and provide active travel measures. The <b>Transport Assessment</b> [<a href="#">APP-258</a>] incorporates a Framework Travel Plan that will support the achievement of those targets and outlines proposals for comprehensive monitoring of the mode share.</p> <p>The application is also accompanied by a series of <b>Surface Access</b></p>
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	<p>9. Provides safe and suitable access for all vehicles, pedestrians, cyclists, horses riders, public transport and the delivery of goods.</p> <p>10. Is accompanied by an agreed Green Travel Plan where it is necessary to minimise a potentially significant impact of the development on the wider area or as a result of needing to address an existing local traffic problem.</p>	<p><b>Commitments</b> set out in <b>ES Appendix 5.4.1</b> <a href="#">[APP-090]</a>. This includes the Applicant’s commitment to provide funding towards bus and coach services. Routes have been identified which are considered to most likely make the greatest difference to mode shares. These are included in the strategic transport model to achieve the mode shares assessed as part of the Application. GAL is committed to provide reasonable financial support in relation to the services, and there is flexibility to support other services if it results in an equivalent level of public transport accessibility.</p> <p>Overall and based on the content of these application documents, the Project does not conflict with Policy 40.</p>
<p><b>Policy 41: Parking</b></p>	<p>1. Development should seek to improve parking in town centres so it is convenient, safe and secure. Parking</p>	<p>Policy 41 is listed in the <b>Joint West Sussex Local Impact Report</b></p>



	<p>provision must ensure a balance between good urban design, highway safety, residential amenity and promoting town centre attractiveness and vitality.</p> <ol style="list-style-type: none"> <li>2. Adequate parking and facilities must be provided within developments to meet the needs of anticipated users. Consideration should be given to the needs of cycle parking, motorcycle parking, charging plug-in or other low emission vehicles and the mobility impaired.</li> <li>3. Development which involves the loss of existing parking spaces will only be allowed if suitable alternative provision has been secured elsewhere or the need for the development overrides the loss of parking and where necessary measures are in place to mitigate against the impact.</li> <li>4. Planning permission will not be granted for off-airport parking facilities related to Gatwick Airport unless a need can be demonstrated and all realistic alternatives have been examined.</li> </ol>	<p><a href="#">[REP1-068]</a> (para 17.18) as forming part of the local policy context for the Project. However, the Project proposals do not relate to off-airport parking or loss of parking provisions within HDC’s jurisdiction and therefore Policy 41 is not relevant to the Project.</p>
<p><b>Policy 42:</b> <b>Strategic Policy:</b> <b>Inclusive</b> <b>Communities</b></p>	<p>Positive measures which help create a socially inclusive and adaptable environment for a range of occupiers and users to meet their long term needs will be encouraged and supported. Particular account will be taken of the need to address the requirements stemming from:</p>	<p>Policy 42 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 17.18) as forming part of the policy context for the Project.</p>

	<ol style="list-style-type: none"> <li>1. The needs of an ageing population, particularly in terms of housing and health;</li> <li>2. People with additional needs, including the disabled or those with learning disabilities;</li> <li>3. The requirements of rural workers or essential workers in rural areas;</li> <li>4. The co-ordination of services to fulfil the needs of young people;</li> <li>5. The specific needs of minority groups within the district, including Gypsies and Travellers; and</li> <li>6. The specific needs of faith and other community groups.</li> </ol>	<p>The Project’s design principles include measures to ensure the detailed design of the scheme (to be confirmed under Requirement 4) is accessible for all, with particular regard to ensure access points are compliant with the Disability Discrimination Act and disabled parking spaces are provided. It is therefore considered that the Project complies with Policy 42, where matters are relevant to the Project.</p>
<p><b>Policy 43: Community Facilities, Leisure and Recreation</b></p>	<ol style="list-style-type: none"> <li>1. The provision of new or improved community facilities or services will be supported, particularly where they meet the identified needs of local communities as indicated in the current Sport, Open Space and Recreation Study and other relevant studies, or contribute to the provision of Green Infrastructure.</li> <li>2. In addition to supporting facilities or services located in accordance with the Development Hierarchy and Strategic Development locations, sites located outside built-up areas will be supported where this is the only practicable option</li> </ol>	<p>Policy 43 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.22) as forming part of the policy context for the Project.</p> <p>The Project does not relate to the provision of new or improved communities facilities or services in Horsham District, and therefore Policy 43 is not relevant to the Project.</p>

	<p>and where a suitable site well-related to an existing settlement exists.</p> <p>3. Proposals that would result in the loss of sites and premises currently or last used for the provision of community facilities or services, leisure or cultural activities for the community will be resisted unless equally usable facilities can be conveniently provided nearby. It will be necessary to demonstrate that continued use of a community facility or service is no longer feasible, taking into account factors such as; appropriate marketing, the demand for the use of the site or premises, its quality and usability, and the identification of a potential future occupier. Where it cannot be demonstrated that such a loss is surplus to requirements, a loss may be considered acceptable provided that:</p> <ul style="list-style-type: none"> <li>a. an alternative facility of equivalent or better quality and scale to meet community needs is available, or will be provided at an equally accessible location within the vicinity; or</li> <li>b. a significant enhancement to the nature and quality of an existing facility will result from the redevelopment for alternative uses on an appropriate proportion of the site.</li> </ul>	
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Horsham District Local Plan 2023 – 2040 (Regulation 19)		
Policy Reference	Policy Description	Compliance Commentary
<b>Conserving and Enhancing the Natural Environment</b>		
Draft Strategic Policy 17 <sup>1</sup> : Strategic Policy: Green Infrastructure and Biodiversity	<p><b>Green Infrastructure</b></p> <ol style="list-style-type: none"> <li>1. Development will be supported where it can demonstrate that it maintains and enhances the existing network of green infrastructure and contributes to the delivery of public open space, the Local Nature Recovery Strategy, Nature Recovery Network, natural capital, ecosystem services and / or biodiversity. Green Infrastructure should be integral to the design and layout of development, and new provision, including green linkages, should be provided taking into account Natural England’s green infrastructure guidance and the council’s green infrastructure strategy. Provision should seek to optimise public access to open space and nature via foot, bicycle, wheeling, and also horse as appropriate.</li> <li>2. Proposals that would result in any loss, degradation or harmful impacts to green infrastructure, or core areas of the Local Nature Recovery Strategy and Nature Recovery</li> </ol>	<p>Draft Policy 17 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 9.37) as forming part of the policy context for the Project.</p> <p><b>Green Infrastructure</b> Parts 1 to 4 of Draft Policy 17 are not applicable to the Project, given it is not located within HDC jurisdiction and therefore does not relate to the maintenance, enhancement or loss of green infrastructure or habitats, or impacts on watercourse, in the District.</p> <p><b>Biodiversity</b></p>

<sup>1</sup> In the Joint **West Sussex Local Impact Report** [X] (para 9.37), reference is made to ‘Policy 31’ of the Draft Horsham Local Plan however on the basis of the policy extract included in paragraph 9.37, the Applicant believes that this reference was incorrect and the paragraph had intended to refer to Policy 17, which is therefore considered in this table.

	<p>Network will be resisted unless it can be demonstrated that new opportunities will be provided that appropriately mitigates and / or compensates for the respective harm and ensures that the ecosystem services of the area are retained and enhanced. Development proposals will be expected to remove invasive species.</p> <ol style="list-style-type: none"> <li>3. Proposals will be expected to retain and enhance existing priority habitats and trees, and accord with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies. Habitat enhancement including additional hedgerow and tree planting must take account of the local landscape and habitat context. It should seek to optimise biodiversity, ecological connectivity and function, and climate change resilience.</li> <li>4. Development likely to affect a watercourse and its associated corridor should seek to conserve and enhance its ecological, landscape and recreational value. This should include providing adequate natural buffer zones to the watercourse.</li> </ol> <p><b>Biodiversity</b></p> <ol style="list-style-type: none"> <li>5. The Council will support appropriate new development which delivers at least 12% biodiversity net gain and:             <ol style="list-style-type: none"> <li>a) Retains and enhances significant features of nature conservation value on development sites;</li> </ol> </li> </ol>	<p>The Project has been designed to achieve Biodiversity Net Gain (BNG). The BNG proposals are set out within <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> (Doc Ref. 5.3), submitted in compliance with Part 6 of Draft Policy 17, and demonstrate that a substantial BNG of over 20% will be achieved. The Project therefore exceeds the aim of Parts 5 of Draft Policy 17 to achieve a 12% net gain.</p> <p><b>Protected Sites and Species</b></p> <p>The impact of the Project on ecology has been fully assessed through the Environmental Impact Assessment process, the results of which are set out in <b>ES Chapter 9: Ecology And Nature Conservation</b> [<a href="#">APP-034</a>]. The assessment process was based on detailed ecology surveys undertaken over a period of four years (2019 to 2023), the results of which are set out in the various <b>Chapter 9</b></p>
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	<p>b) Makes a positive contribution to biodiversity and accords with the aims and objectives of the Green Infrastructure and Local Nature Recovery Strategies, through the creation of appropriate green spaces, that provide linkages between habitats to create local and regional ecological networks that enable the movement of wildlife through development sites; and / or</p> <p>c) Following the principle of ‘right habitat in the right place’, significantly increases woodland or other habitats for the purpose of appropriately enhancing biodiversity, carbon sequestration, pollution control, and / or flood mitigation.</p> <p>6. Relevant development proposals will be expected to deliver 12% biodiversity net gain and must submit Biodiversity Net Gain information to show how this will be achieved using the mandated Biodiversity Metric or the Small Sites Metric as appropriate and must abide by the metric trading rules. Submissions must make clear what will be provided to meet no net loss and what will deliver net gains. The net gain must be achieved through the delivery of appropriate on-site biodiversity net gain or, where this is not practicable, through off-site net gain within the District especially areas, as suitable to the habitats subject to gain, identified in the District’s Green</p>	<p><b>Appendices</b> [APP-123 to APP-133]. The assessment process followed good practice guidelines and considered all Important Ecological Resources identified. This includes designated sites, habitats and flora/fauna.</p> <p><b>ES Chapter 9</b> [APP-034] also provides an assessment of the Project’s effects on international, national, regional/county and local designated sites. The designated sites within the search areas are shown on <b>ES Figure 9.6.1</b> [APP-048] and described in <b>Section 9.6 of ES Chapter 9: Ecology and Nature Conservation</b> [APP-034]. The assessment reflects the principles of Biodiversity 2020: A Strategy for England’s wildlife and ecosystem services, summarised in <b>Section 9.13 of ES Chapter 9: Ecology and Nature Conservation</b> [APP-034].</p>
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	<p>Infrastructure Strategy or the Local Nature Recovery Strategy, or as agreed by the Council. All such schemes, excluding any respective element using statutory biodiversity credits, must submit for approval by the Council a funded maintenance and management plan, including monitoring / reporting and appropriate enforcement processes, that secures the biodiversity net gains for at least 30 years.</p> <p>7. All other development proposals must seek to demonstrate how measurable biodiversity net gains will be delivered.</p> <p><b>Protected Sites and Species</b></p> <p>8. Proposals must give appropriate consideration to protected and notable species. They will be expected to protect priority species and seek to aid their recovery, and must conserve, restore and enhance priority habitats, and should create and manage appropriate new habitats, taking into account pollination, where practicable.</p> <p>9. Particular consideration will be given to the hierarchy of sites and habitats, including buffer areas, within the District, or functionally linked to, as follows:</p> <p>a) Special Protection Areas (SPAs), Special Areas of Conservation (SACs) and Ramsar sites;</p>	<p>No residual significant adverse effects were identified with the overall conclusion of the assessment that the Project would have a net benefit for ecology, as demonstrated by the circa 20% Biodiversity Net Gain, as set out in <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> (Doc Ref. 5.3). The Project therefore complies with Parts 8 to 13 of Draft Policy 17.</p>
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	<ul style="list-style-type: none"> <li>b) Sites of Special Scientific Interest (SSSIs), National Nature Reserves (NNRs), Veteran Trees, Ancient Woodland and other irreplaceable habitats;</li> <li>c) Local Wildlife Sites (LWS), Local Nature Reserves (LNRs) and any areas of priority habitats including traditional orchards, local geodiversity, Core Sites in the emerging NRN and other irreplaceable habitats not already identified in a &amp; b above.</li> </ul> <p>10. An appropriate buffer around woodland will be required, this will be at least 15m around Ancient Woodland or greater in accordance with good practice, and consideration should be given to the potential for protected species, such as bats, and impacts on hydrology. Around ancient and veteran trees a minimum buffer zone of at least 15 times larger than the diameter of the tree, or 5 metres from the edge of the tree's canopy whichever is the larger, will be required.</p> <p>11. Where the felling of a tree is necessary, for example due to disease, replacement planting with a suitable tree species, age and location to retain and enhance the link with the wider network of habitats and Green Infrastructure, will be required.</p> <p>12. Where development is anticipated to have a direct or indirect adverse impact on sites or features of importance</p>	
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	<p>to nature conservation, development will be refused unless it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a) The mitigation hierarchy has been applied and the objectives of a site’s designation, where applicable, and integrity of the area will not be undermined;</li> <li>b) The reason for the development clearly outweighs the likely impact to notified features and / or the need to protect the value of the site; and</li> <li>c) Appropriate mitigation and compensation measures will be provided alongside the delivery of measurable biodiversity net gain as relevant.</li> </ul> <p>13. Any development with the potential to impact the Arun Valley SPA / SAC / Ramsar site, The Mens SAC and / or Ebernoe Common SAC will be subject to a Habitats Regulation Assessment to determine the need for an Appropriate Assessment. In addition, development will be required to be in accordance with the necessary mitigation measures for development set out in the Habitat Regulation Assessment of this Plan.</p>	
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## 2 References

Horsham District Council (2015) Horsham District Planning Framework (2015 – 2031). Adopted November 2015.

Horsham District Council (2024) Horsham District Local Plan 2023 – 2040 (Regulation 19).

## 3 Glossary

Term	Description
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
NRP	Northern Runway Project
oLEMP	Outline Landscape and Ecology Management Plan

## Annex D: Local Planning Compliance Table – Tandridge District Council

## 1 Local Planning Policy Compliance Tables – Annex D – Tandridge District Council

### 1.1. Introduction

1.1.1 This document comprises a Local Planning Policy Compliance Table in respect of Tandridge District Council's (TDC) Development Plan, setting out local planning policies that are of relevance to the Northern Runway Project (NRP) and the extent to which the NRP complies with those policies.

1.1.2 As made clear in the **Planning Statement** [APP-245], national policy provides the primary planning policy framework for the consideration and determination of the Project, however local planning policy can also be important and relevant. Where any conflicts arise between local and national policy, national planning policy would prevail. **Appendix C** [APP-248] of the Planning Statement contains Planning Policy Compliance Tables which identify and respond to national planning policy.

1.1.3 This document:

- identifies TDC's local policies which may be relevant to the consideration of the Project, including any specific local policies related to Gatwick Airport; and
- provides a summary of the Project's compliance with TDC's policies, including cross-references to key documents forming part of the DCO application where additional detailed information can be found.

1.1.4 This document has also been prepared taking account of the **Joint Surrey Councils Local Impact Report** (LIR) [REP1-097] prepared by TDC, together with Surrey County Council, Reigate and Banstead Borough Council and Mole Valley District Council. This document identifies and responds to local policies referenced as relevant in the **Joint Surrey Councils LIR**.

1.1.5 In line with the **Joint Surrey Councils LIR** [REP1-097], the policy documents considered in this document comprise:

Adopted Development Plan documents

- Tandridge Core Strategy 2008
- Tandridge Local Plan Part 2: Detailed Policies 2014-2029

1.1.6 TDC prepared a draft Tandridge Local Plan 2033, which was submitted for examination in January 2019. Following a series of public hearing sessions and exchange of correspondence, the appointed Inspector indicated that the draft Local Plan was likely to be found ‘unsound’. On 14<sup>th</sup> February 2024, the Inspector issued his Final Report which concluded that the Local Plan is unsound and therefore incapable of being adopted. As a result, the draft Tandridge Local Plan 2033 is not considered within this local policy compliance document.

1.1.7 The planning policy designations that apply to land within the Project’s Order Limits that fall within TDC administrative boundary are identified on the **Planning Policy Plan** contained in **Planning Statement Appendix B** (Doc Ref. 7.1).

1.1.8 The Project boundary within the administrative area of TDC relates to a short section of the northbound M23, exiting from the Gatwick Interchange roundabout (Junction 9), and a strip of land to the north of the eastbound M23 Gatwick Spur. The extent of works proposed by the Project within TDC’s jurisdiction are limit to the provision of a re-provided access to the east and west of Peeks Brook Lane and minor improvements works within the existing M23 carriageway. These works relate to the wider highway enhancement works along the M23 Gatwick Spur and to the South Terminal Roundabout, shown on **Sheet 2** of the **Surface Access Highways Plans – General Scheme Outline** [[AS-081](#)]. The Project boundary within TDC’s jurisdiction is within the designated Metropolitan Green Belt.

1.1.9 Other points to note:

- There are a number of adopted ‘made’ Neighbourhood Plans in place across the District. As confirmed in the **Joint Surrey Councils Local Impact Report** [[REP1-097](#)] (para 3.43), none of the Neighbourhood Plans are close to Gatwick Airport and therefore not considered within this document.
- Paragraph 7.31 of the **Joint Surrey Council Local Impact Report** [[REP1-097](#)] makes reference to ‘DMP Policy NHE3’ as forming part of TDC’s local policy context for ecology and nature conservation. The Applicant

has not been able to identify this policy in TDC's Development Plan and therefore it is excluded from this local policy compliance document.

Tandridge Core Strategy 2008		
Policy Reference	Policy Description	Compliance Commentary
<b>Social Progress</b>		
<p><b>Policy CSP13: Community, Sport and Recreation Facilities and Services</b></p>	<p>Existing community, recreational, sports facilities and services (see Glossary) and open space will be safeguarded. New or improved facilities to meet the needs of all sections of the community will be encouraged. The Council will encourage the dual use of community and sports facilities.</p> <p>Residential development may be required to include appropriate open space, play areas or other accessible green space to meet the needs of residents and/or to contribute to the enhancement of such facilities in the area.</p> <p>The loss of open space, sport and recreation facilities is dealt with in national planning policies (PPG17). For the loss of other community facilities and/or services as defined in the Glossary, the principles of assessment set out in those national planning policies (PPG17) will be operated, and the exact details will be set out in the Development Control DPD.</p> <p>The Council will apply the standard of 1.27 ha per 1000 population to the provision of playing space for all ages.</p>	<p>Policy CSP13 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 17.16) as forming part of the policy context for the Project.</p> <p>The Project works within TDC's jurisdiction do not include new or improved community, recreational or sports facilities, or result in the loss of existing facilities. Paragraphs 1 to 4 of Policy CSP13 are therefore not applicable to the Project.</p> <p>In respect of paragraph 5, a short section of an existing Public Right of Way (PRoW) (FP 368) crosses into the Project boundary within TDC's jurisdiction. No works are proposed by the Project to the section of FP 368 within TDC's jurisdiction, as shown on the <b>Rights of Way and Access Plans [REP1-014]</b>. As</p>

	<p>The Council will seek to protect the Rights of Way network, in particular the North Downs Way national trail, the Greensand Way and Vanguard Way recreational paths from developments that would adversely affect the enjoyment of users of the network. The Council will encourage improvements to the network and the North Downs Way.</p>	<p>such, the Project does not conflict with Policy CSP13.</p>
<b>Environmental Protection</b>		
<p><b>Policy CSP16: Aviation Development</b></p>	<p>The Council will seek to minimise the impact of Gatwick Airport by working with BAA Gatwick, Crawley Borough Council and adjoining local authorities on the development of the airport up to the projected 45 million passengers per annum within the agreed limits of a single runway/two terminal airport. New off-airport parking and extensions to existing sites will be considered in the light of Green Belt policy and the need to minimise the use of the private car to travel to the airport.</p> <p>The Council will oppose any expansion beyond the agreed limits that would adversely affect communities in Tandridge by way of aircraft noise or reduced air quality.</p> <p>The Council will oppose any expansion of Biggin Hill Airport that would adversely affect communities in Tandridge by way of aircraft noise, air pollution, or that would result in additional traffic using country roads.</p>	<p>Policy CSP16 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 3.41 and 12.52) as forming part of the policy context for the Project.</p> <p>Policy CSP16 is contained in the Core Strategy, which was adopted in 2008. Between the 2009 and 2019, the airport experienced a sustained period of growth with passenger numbers reaching more than 46mppa in 2019 as explained in <b>ES Chapter 1: Introduction [APP-026]</b> and therefore Policy CSP16 is considered within this context.</p> <p>The Project relates to making best use of Gatwick Airport’s existing northern</p>



	<p>The Council will not permit development at Redhill Aerodrome that would be likely to intensify flying or related activities. The Council will not permit the construction of a reinforced runway or other development if it is likely to be significantly detrimental to the local community.</p>	<p>runway, being a second (emergency) runway at the airport, and does not relate to safeguarded land for a further runway to the south of the existing airport. Excluding the proposed surface access works and environmental mitigation areas, the Project's Order Limits are within the 'Gatwick Airport Boundary' defined on Crawley Borough Council's adopted Local Plan Map (October 2015). Further detail on the case for the Project is set out in the <b>Needs Case</b> <a href="#">[APP-250]</a> and <b>Planning Statement</b> <a href="#">[APP-245]</a>.</p> <p>The impact of the Project on aircraft noise, air quality and traffic volumes has been fully assessed in the Environmental Impact Assessment process, the results of which are set out in <b>ES Chapter 12: Traffic and Transport</b> <a href="#">[APP-037]</a>, <b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> and <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> together with supporting ES appendices. <b>ES Chapter 18: Health and Wellbeing</b> <a href="#">[APP-043]</a> has also considered the impact in the changes in noise exposure on communities.</p>
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		<p>The Project proposals within TDC’s jurisdiction do not relate to new or extended off-airport parking, an expansion of Biggin Hill Airport or development at Redhill Aerodrome. Therefore, those elements of Policy CSP16 are not relevant to the Project.</p> <p>Overall, it is not considered that the Project conflicts with Policy CSP16.</p> <p>It is noted that the submitted version of the Draft Tandridge Local Plan 2033 had sought to replace Policy CSP16 with a focused policy to manage airport parking, under Draft Policy TLP51: Airport Parking, meaning TDC had not intended to maintain a desired passenger limit on the airport’s capacity within its new Local Plan.</p>
<p><b>Policy CSP17: Biodiversity</b></p>	<p>Development proposals should protect biodiversity and provide for the maintenance, enhancement, restoration and, if possible, expansion of biodiversity, by aiming to restore or create suitable semi-natural habitats and ecological networks to</p>	<p>Policy CSP17 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (page 80) as forming part of the policy context for the Project. The</p>

	<p>sustain wildlife in accordance with the aims of the Surrey Biodiversity Action Plan.</p> <p>The Council will seek to enhance biodiversity by supporting the work of the Downlands Countryside Management Project and by supporting Local Nature Reserves and Community Wildlife Areas.</p>	<p>policy reference is made in relation to a need for replacement ponds.</p> <p>A small section of existing pond, as shown on <b>Sheet 2</b> of the <b>Surface Access Highways Plans – General Scheme Outline</b> [<a href="#">AS-081</a>], is located within the Project boundary in TDC’s jurisdiction. No works are proposed to this pond as part of the Project.</p> <p><b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] provides an assessment of the Project’s effects on ecology and nature conservation, including an assessment of statutory and non-statutory designated sites within the search area. This includes the River Mole Biodiversity Opportunity Area which crosses the Project boundary falling in TDC’s jurisdiction. The designated sites within the search areas are shown on <b>ES Appendix 9.6.1: Ecological Desk Study</b> [<a href="#">APP-123</a>] and described in Section 9.6 of <b>ES Chapter 9</b>. The assessment identifies that the Project would not</p>
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		<p>directly affect the target habitats of the BOA.</p> <p>As such, the Project does not conflict with Policy CSP17.</p>
<p><b>Policy CSP20: Area of Outstanding Natural Beauty</b></p>	<p>The conservation and enhancement of the natural beauty of the landscape is of primary importance within the two Areas of Outstanding Natural Beauty, reflecting their national status.</p> <p>The principles to be followed in the area are to:</p> <ul style="list-style-type: none"> <li>a) conserve and enhance the special landscape character, heritage, distinctiveness and sense of place of the locality;</li> <li>b) conserve and enhance important viewpoints, protect the setting and safeguard views out of and into the AONB;</li> <li>c) protect prominent locations on skylines and slopes and for development to take advantage of existing landscape features and tree screening;</li> <li>d) support suitable located sustainable development necessary to facilitate the environmental, economic and social well being of the AONBs and their communities;</li> <li>e) promote access to, particularly by means other than the car, recreation within and enjoyment of the area;</li> <li>f) apply the highest environmental design standards to development.</li> </ul>	<p>Policy CSP20 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 6.38) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> and <b>Section 8.15 of the Planning Statement [APP-245]</b> provides an assessment of the Project’s potential effects upon AONBs and other designated landscapes within the study area informed by the zones of theoretical visibility. This includes an assessment of the Project’s effects on the High Weald AONB and Surrey Hills AONB.</p> <p><b>ES Chapter 8 [APP-033]</b> also includes an assessment of effects on the perception of tranquillity within nationally designated landscapes. The assessment</p>

	<p>The same principles will be applied in the associated Area of Great Landscape Value which will be retained for its own sake; as a buffer to the Surrey Hills AONB and to protect views from and into the AONB. The AGLV will be retained until such time as there has been a review of the AONB boundary.</p>	<p>concludes that an increase of up to 20% in overflights compared to the future baseline in 2032 would result in minor adverse effects on the perception of tranquility, which is not significant. The Project will therefore not materially affect the positive qualities visitors and nearby residents expect of the AONBs (such as Surrey Hills), including distant scenic views and the landscape’s relative tranquillity and dark skies.</p> <p>Mitigation and enhancement measures are adopted as part of the Project, detailed in <b>Section 8.8 of ES Chapter 8 [APP-033]</b>. This includes the provision of vegetation retention strategies for all elements of the Project coinciding with existing significant vegetation, secured through <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (LEMP)</b> [REP2-021, REP2-023, REP2-025 and REP2-027] and subsequent LEMPs, to ensure that significant vegetation is retained to protect the natural beauty and setting of designated AONBs.</p>
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		<p>As such, the Project does not conflict with Policy CSP20.</p>
<p>Policy CSP21: Landscape and Countryside</p>	<p>The character and distinctiveness of the District’s landscapes and countryside will be protected for their own sake, new development will be required to conserve and enhance landscape character.</p>	<p>Policy CSP21 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 6.40) as forming part of the policy context for the Project.</p> <p>The potential effects of the Project on the existing landscape character is assessed in <b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> and <b>Section 8.15</b> of the <b>Planning Statement [APP-245]</b>. The assessment in <b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> has been informed by a review of relevant Landscape Character Areas, as described in <b>Sections 8.4 and 8.6</b> of <b>ES Chapter 8</b> and in <b>ES Appendix 8.6.1: County Landscape Character Assessments [APP-110]</b>. The design of the Project has had full regard to the landscape character assessed in <b>ES Chapter 8</b> and demonstrates that the</p>

		<p>Project has a negligible to minor adverse visual impact on the natural landscape.</p> <p>The Project therefore complies with Policy CSP21.</p>
<b>A Sustainable Economy</b>		
<p>Policy CSP22: The Economy</p>	<p>The Council will seek to develop a sustainable economy by:</p> <ul style="list-style-type: none"> <li>a) Seeking to make best use of existing commercial and industrial sites, especially those suitable for occupation by small businesses;</li> <li>b) Allowing buildings in the Green Belt to be used for commercial purposes subject to environmental, farm viability, traffic and amenity considerations, (the Council's preference for the re-use of such buildings is for economic development purposes). Further details will be set out in the Development Control DPD;</li> <li>c) Allowing redundant or unsuitably located commercial and industrial sites within the built-up areas, Larger Rural Settlements and Green Belt Settlements to be redeveloped for housing or other appropriate alternative uses. Further details will be set out in the Development Control DPD;</li> <li>d) Encouraging working at home (subject to amenity considerations).</li> </ul>	<p>Policy CSP22 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 15.47) as forming part of the policy context for the Project.</p> <p>The Project proposals within TDC's jurisdiction do not fall within the definition of Policy CSP22 and therefore this Policy is not relevant to the Project.</p>

	<p>The following sites are designated as “Strategic Employment Sites” and will be retained for the existing uses:</p> <ul style="list-style-type: none"> <li>• Lambs Business Park</li> <li>• Hobbs Industrial Estate</li> </ul> <p>In the case of Hobbs Industrial Estate certain waste processing uses will be acceptable if the site is identified for such in the Waste Development Framework.</p> <p>The Council will review the allocated employment site at Coopers Close, Smallfield through the site allocations DPD.</p>	
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Tandridge Local Plan Part 2: Detailed Policies 2014-2029		
Policy Reference	Policy Description	Compliance Commentary
<b>A Sustainable Economy</b>		
Policy DP5: Highway Safety & Design	<p>A. Development will be permitted subject to meeting the requirements of all other appropriate Development Plan policies and where the proposal:</p> <ol style="list-style-type: none"> <li>1. Complies with the relevant Highway Authority’s and any other highways design guidance;</li> <li>2. Does not unnecessarily impede the free flow of traffic on the existing network or create hazards to that traffic and other road users;</li> <li>3. Retains or enhances existing footpaths and cycleway links;</li> <li>4. Provides safe and suitable access to the site which is achievable by all and promotes access by public transport, foot and bicycle to nearby residential, commercial, retail, educational, leisure and recreational areas where appropriate; and</li> <li>5. Fully funds where appropriate, or contributes towards the costs of any measures required to cost effectively mitigate the significant impacts arising from the development.</li> </ol>	<p>Policy DP5 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 10.44) as forming part of the policy context for the Project.</p> <p><b>Section 12.6 of ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>] describes the existing transport network, public transport routes and cycling and walking network in relation to the Project, and <b>Section 12.8</b> sets out the mitigation and enhancement measures proposed as part of the Project to increase the use of public transport and provide active travel measures in line with Parts A(3) and A(4). This includes a number of highways interventions to provide mitigation for the increased volumes of traffic on roads in the locality in accordance with Part A(2), for both construction and operational phases of the Project, and includes the minor</p>

	<p>B. In accordance with the Council’s Local Validation Requirements and national guidance, all development proposals that generate significant amounts of movement should be supported by a Travel Plan and either a Transport Statement or Transport Assessment (proportionate to the scale of the proposed scheme and extent of the transport implications), both of which should be submitted alongside the planning application.</p>	<p>improvements works within the existing M23 Junction 9 carriageway in TDC’s jurisdiction.</p> <p>With regards to Part A(1), the design of these works has been developed through the alternatives assessment process (detailed in <b>ES Chapter 3 [APP-028]</b>) and informed by appropriate guidance, including the Design Manual for Roads and Bridges. The design has also been informed by extensive engagement with National Highways, with the latest matters reported in the <b>Statement of Common Ground between GAL and NH [REP1-036]</b>.</p> <p>In respect of Part A(5), the surface access improvement works will be fully funded by GAL and undertaken in consultation with National Highways and local authorities. The surface access improvement works are secured through Schedule 1 of the <b>Draft DCO [REP1-004]</b>.</p> <p>The Applicant has also proposed to secure, through a Section 106 Agreement,</p>
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		<p>a Sustainable Transport Fund to support the delivery of the Surface Access Commitments and uptake of sustainable travel modes to achieve mode share commitments and a Transport Mitigation Fund which can be used to address any unforeseen impacts on the local transport networks.</p> <p>A <b>Transport Assessment</b> [<a href="#">APP-258</a>] has been submitted as part of the application, including a Framework Travel Plan, in accordance with Part B of Policy DP5. <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>] also provides an assessment of the potential transport impacts of the Project. A Travel Plan will also be implemented for construction workers, as part of the wider approach to managing the transport aspects of construction activity. This is set out in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 2 – Outline Construction Workforce Travel Plan</b> [<a href="#">APP-082</a>], to be secured under Requirement 13 of the <b>Draft DCO</b> [<a href="#">REP1-004</a>].</p>
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		<p>Overall, the Project is considered to comply with Policy DP5.</p>
<p>Policy DP19: Biodiversity, Geological Conservation &amp; Green Infrastructure</p>	<p>A. There will be a presumption in favour of development proposals which seek to:</p> <ol style="list-style-type: none"> <li>1. Protect, enhance or increase the provision of, and access to the network of multi-functional Green Infrastructure (GI);</li> <li>2. Promote nature conservation and management;</li> <li>3. Restore or create Priority Habitats; or</li> <li>4. Maximise opportunities for geological conservation.</li> </ol> <p>B. In order to conserve and enhance the natural environment, proposals which would result in significant harm to local, national or statutory sites of biological or geological importance or the broader GI network will be refused planning permission unless:</p> <ol style="list-style-type: none"> <li>1. All reasonable alternative locations with less harmful impacts are demonstrated to be unsuitable; and</li> <li>2. The proposal incorporates measures to avoid the harmful impacts arising, sufficiently mitigate their effects, or, as a last resort, compensate for them.</li> </ol> <p>C. Where a proposal is likely to result in direct or indirect harm to an irreplaceable environmental asset of the</p>	<p>Policy DP19 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 8.12) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] provides an assessment of the Project's effects on ecology and nature conservation, including an assessment of statutory and non-statutory designated sites within the search area. This includes the River Mole Biodiversity Opportunity Area which crosses the Project boundary falling in TDC's jurisdiction. Commentary in respect of the BOA is provided against Policy CSP17. In respect of Part C of Policy DP19, <b>ES Chapter 9</b> assessment identifies that the Project would have no direct effect on SSSIs. Mitigation measures adopted as part of the Project would ensure that there are no significant effects on SSSIs.</p>

	<p>highest designation, such as a Site of Special Scientific Interest (SSSI), ancient woodland or veteran trees, the granting of planning permission will be wholly exceptional.</p> <ol style="list-style-type: none"> <li>1. With regard to SSSIs, exceptions will only be made where benefits of development at the site clearly outweigh both the impacts on the features of the site and on any broader networks of SSSIs.</li> <li>2. In the case of ancient woodland and veteran trees exceptions will only be made where the need for and benefits of the development in that location clearly outweigh the loss.</li> <li>3. In all cases, any impacts or harm should not just be mitigated, but overall ecological benefits should be delivered.</li> </ol> <p>D. Planning permission for development directly or indirectly affecting protected or Priority species will only be permitted where it can be demonstrated that the species involved will not be harmed or appropriate mitigation measures can be put in place.</p>	<p>The Project's embedded and good practice mitigation measures are detailed in <b>Section 9.8 of ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>], together with detailed ecological mitigation strategies in relation to specific species contained in <b>ES Appendix 9.6.3: Bat Trapping and Radio Tracking Surveys Parts 1 and 2</b> [<a href="#">APP-131</a> and <a href="#">APP-132</a>] and <b>ES Appendix 9.6.4 Confidential Badger Survey</b> [<a href="#">APP-133</a>]. The measures detailed within <b>Section 9.8 of ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] have been designed to ensure that impacts of the Project on ecological receptors are avoided, reduced or mitigated where effects are unavoidable.</p> <p>Overall, it is considered that the Project does not conflict with Policy DP19.</p>
<p><b>Policy DP20: Heritage Assets</b></p>	<p>A. There will be a presumption in favour of development proposals which seek to protect, preserve and wherever possible enhance the historic interest, cultural value, architectural character, visual</p>	<p>Policy DP20 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 5.28) as forming part of the policy context for the Project.</p>

	<p>appearance and setting of the District’s heritage assets and historic environment. Accordingly:</p> <ol style="list-style-type: none"> <li>1. Only where the public benefits of a proposal significantly outweigh the harm to, or loss of a designated heritage asset or its setting, will exceptional planning consent be granted. These benefits will be proportional to the significance of the asset and to the level of harm or loss proposed.</li> <li>2. Where a proposal is likely to result in substantial harm to, or loss of, a designated heritage asset of the highest significance (i.e. scheduled monuments, grade I and grade II* listed buildings, and grade I and grade II* registered parks and gardens), granting of permission or consent will be wholly exceptional.</li> </ol> <p>B. In all cases the applicant will be expected to demonstrate that:</p> <ol style="list-style-type: none"> <li>1. All reasonable efforts have been made to either sustain the existing use, find viable alternative uses, or mitigate the extent of the harm to the asset; and</li> <li>2. Where relevant the works are the minimum necessary to meet other legislative requirements.</li> </ol>	<p><b>ES Chapter 7: Historic Environment</b> <a href="#">[APP-032]</a> and <b>Section 8.14</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a> form part of the documentation for the application that consider heritage assets. A series of assessments support ES Chapter 7, including a study of Conservation Areas within <b>ES Appendix 7.6.1: Historic Environment Baseline Report</b> <a href="#">[APP-101]</a> and an archaeological evaluation within <b>ES Appendix 7.6.2: Archaeological Evaluation Report</b> <a href="#">[APP-102]</a>, <b>ES Appendix 7.6.3: Archaeological Evaluation Report Phase 2 - Longbridge Roundabout and Reigate Field</b> <a href="#">[APP-103]</a> and <b>ES Appendix 7.6.4: Geotechnical Data Review</b> <a href="#">[APP-104]</a>.</p> <p>Subject to appropriate mitigation, as secured through <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[APP-082]</a>, <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> [REP2-021, REP2-023, REP2-025 and REP2-027], and <b>ES Appendix 7.8.1: Written Scheme of Investigation for post-consent Archaeological</b></p>
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	<p>C. With the granting of permission or consent the Council will require that:</p> <ol style="list-style-type: none"> <li>1. The works are sympathetic to the heritage asset and/or its setting in terms of quality of design and layout (scale, form, bulk, height, character and features) and materials (colour and texture); and</li> <li>2. In the case of a Conservation Area, the development conserves or enhances the character of the area and its setting, including protecting any existing views into or out of the area where appropriate.</li> </ol> <p>D. Any proposal or application which is considered likely to affect a County Site of Archaeological Importance, or an Area of High Archaeological Potential (AHAP), or is for a site larger than 0.4 hectares located outside these areas, must be accompanied by an archaeological desk-top assessment. Where the assessment indicates the possibility of significant archaeological remains on the site, or where archaeological deposits are evident below ground or on the surface, further archaeological work will be required. Evidence should be recorded to enhance understanding and where possible material should be preserved in-situ. In cases where the preservation of remains in-situ is not possible, a full archaeological</p>	<p><b>Investigations – Surrey</b> [<a href="#">APP-105</a>], the proposal will not have any unduly harmful effects on the historic environment, including Conservation Areas or TDC’s heritage assets.</p> <p>The Project would therefore not conflict with Policy DP20.</p>
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	<p>investigation in accordance with a Council approved scheme of work will be required; the results of which should be made available for display at the East Surrey Museum or other suitable agreed location.</p>	
<p>Policy DP21: Sustainable Water Management</p>	<p>A. Water will be retained in the natural environment as far as possible. Proposals which seek to restore natural flows in the river systems or re-establish areas of functional floodplain will be supported, particularly where they would provide opportunities for recreation, habitat restoration/enhancement or additional Green Infrastructure provision.</p> <p><i>Water Quality, Ecology and Hydromorphology</i></p> <p>B. Proposals should avoid damage to Groundwater Source Protection Zones, having regard to the Environment Agency’s ‘Groundwater Protection: Policy and Practice’ guidance or successor documents.</p> <p>C. Development adjacent to, or likely to affect underground or surface water bodies covered by the Water Framework Directive and Thames River Basin Management Plan should, where possible, make improvements to the quality, ecology and hydromorphology of these water bodies. Additionally, such proposals should contribute towards the maintenance or achievement of ‘Good Ecological</p>	<p>Policy DP21 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 9.21) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 11: Water Environment</b> [<a href="#">APP-036</a>] provides an assessment of the Project’s potential effects on water quality, flood risk, groundwater, wastewater and water supply, supported by detailed assessments in <b>ES Appendices 11.9.3 to 11.9.8</b> [APP-144 to APP-151]. This includes <b>ES Appendix 11.9.2: Water Framework Directive Compliance Assessment</b> [<a href="#">APP-143</a>].</p> <p>The <b>ES Chapter 11</b> [<a href="#">APP-036</a>] assessment demonstrates that excavation for building foundations and other sub-surface infrastructure as a result of the Project could impact on groundwater resources (such as River Mole, Gatwick</p>



	<p>Status' for the affected water bodies. This may take the form of on-site measures or a financial contribution to off-site measures.</p> <p><i>Flood Risk</i></p> <p>D. Proposals should seek to secure opportunities to reduce both the cause and impact of flooding; for example through the use of Green Infrastructure for flood storage and, where necessary, the incorporation of Sustainable Drainage Systems (SuDS) suitable to the scale and type of the development, ensuring the discharge of surface run off is restricted to that of the pre-development site. Consideration should be given as to the future maintenance of any proposed SuDS schemes.</p> <p>E. Development within flood risk zones 2 and 3 or on sites of 1 hectare or greater in zone 1, and sites at medium or high risk from other sources of flooding as identified by the Council's Strategic Flood Risk Assessment, will only be permitted where:</p> <ol style="list-style-type: none"> <li>1. The sequential and, where appropriate, exception tests as detailed in 'Technical Guidance to the National Planning Policy Framework'(32) have been applied and passed and the proposal is a development form compatible with the level of risk;</li> </ol>	<p>Stream and Crawler's Brook). Such impacts would be localised or short-term but none of the activities are considered to give rise to no worse than a minor adverse effect which is not considered to be environmentally significant.</p> <p>For water supply, the <b>ES Chapter 11 [APP-036]</b> assessment shows that water demand will increase due to increase in passenger, staff and construction worker numbers during construction and operation of the Project. This would be partially mitigated through the introduction of water efficiencies in the new facilities. In conversations with Sutton and East Surrey Water it has also been provisionally stated that forecast demands are unlikely to negatively impact the water source. The assessment concludes that there are no significant effects during the construction phase or the operational phase.</p> <p>A Flood Risk Assessment (FRA) has also been submitted and is contained <b>ES Appendix 11.9.6 [APP-147 to APP-149]</b>. The FRA considers all forms of flood risk</p>
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	<ol style="list-style-type: none"> <li>2. For all sources of flood risk, it can be demonstrated through a site specific Flood Risk Assessment (FRA)* that the proposal would, where practicable, reduce flood risk both to and from the development or at least be risk neutral; and</li> <li>3. Appropriate flood resilient and resistant design, and mitigation and adaptation measures are included in order to reduce any level of risk identified through a site specific FRA to acceptable levels.</li> </ol> <p><i>* The FRA should demonstrate how flood risk is to be mitigated, development adapted and, where practicable, risk reduced including the consideration of risks from other sources where appropriate. The content and scope of the FRA should be commensurate with the scale of development and be agreed by the District Council in consultation with the Environment Agency.</i></p>	<p>from and due to the Project, and describes the proposed flood mitigation strategy that forms part of the Project. It should be noted that the Project extent that falls within TDC’s jurisdiction is within Flood Zone 1, having the lowest risk of flooding.</p> <p>The Project has been designed with regard to the findings of the <b>ES Appendix 11.9.6: Flood Risk Assessment</b> [<a href="#">APP-147</a>] and the drainage design for the Project has applied a hierarchical approach to design and includes the use of sustainable drainage techniques.</p> <p>As such, the Project would not conflict with Policy DP21.</p>
<p><b>Policy DP22: Minimising Contamination, Hazards &amp; Pollution</b></p>	<p><b>Land Contamination</b></p> <p>A. Proposals for development on land that is or may be contaminated will be permitted provided that there will be no unacceptable risk to health or the environment and provided adequate remedial measures are proposed which would mitigate the effect of any contamination and render the site suitable for use.</p>	<p>The ES submitted as part of the application provides a comprehensive assessment of the Project’s potential effects on the environment, including an assessment against matters contained in Policy DP22. The details are set out below.</p>

	<p>Where there is evidence of a high risk from residual contamination the applicant will be required to show as part of the application how decontamination will be undertaken.</p> <p><i>Hazards</i></p> <p>B. Proposals for development close to hazardous installations will be permitted provided the number of people at risk is not significantly increased. The Council will take into account the views of the Health and Safety Executive when considering proposals for new notifiable installations and the risks it might pose to the surrounding population.</p> <p><i>Noise</i></p> <p>C. The Council will require noise generating forms of development or proposals that would affect noise-sensitive development to be accompanied by a statement detailing potential noise generation levels and any mitigation measures proposed (such as containment of the noise generated, screening barriers or restrictive activities/hours of operation) to ensure that all noise is reduced to an acceptable level. Where a development proposal is able to demonstrate that acceptable noise levels will be achieved, the application will be supported.</p>	<p><b>ES Chapter 10: Geology and Ground Conditions</b> <a href="#">[APP-035]</a> sets out the assessment of potential pollution, ground conditions and contamination effects of the Project, supported by a <b>Preliminary Risk Assessment</b> in <b>ES Appendix 10.9.1</b> <a href="#">[APP-138]</a>. Mitigation measures, including a discovery strategy and ground investigations for contamination, are set out in Section 10.8 of <b>ES Chapter 10</b> in compliance with Part A of Policy DP22.</p> <p><b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> provides an assessment of the Project's potential effects on noise and vibration. An element of the Project's proposed mitigation relates to a noise insulation scheme. Full details of the proposed noise insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in <b>Section 8.21</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. These documents confirm that, subject to</p>
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	<p>D. For proposals involving new residential development sited close to transport derived noise sources, applications will be considered against the noise exposure categories as outlined in the Noise Exposure Categories table (see supporting text), as well as other material considerations where necessary.</p> <p>E. For proposals involving residential and other noise sensitive development that would be sited close to commercial/industrial noise sources (i.e. where transport is not the dominant noise source), the Council will consider applications against the current version of BS4142 in order to assess the likelihood of complaints from future occupiers and therefore the acceptability of the proposed development.</p> <p><i>Lighting &amp; Illumination</i></p> <p>F. Proposals for external lighting as part of a new or existing development will be permitted where the applicant can demonstrate that the lighting scheme is the minimum necessary for security, safety, working or recreational purposes and that it minimises the potential pollution from glare or spillage. Particular attention will be paid to schemes in or close to open countryside or intrinsically dark landscapes, close to residential property and areas important for nature conservation.</p>	<p>embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration environment.</p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> provides an assessment of potential effects on air quality as a result of the Project. The assessment demonstrates that, subject to mitigation measures as set out in <b>Section 13.9 of ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> and in <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a>, the Project complies with Part H of Policy DP22 and there are not predicted to be any significant air quality effects as a result of the Project.</p> <p><b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> considers the potential effects on the landscape arising from construction and operating lighting, informed by <b>ES Appendix 5.2.2: Operational Lighting Framework</b> <a href="#">[APP-077]</a>. <b>ES Appendix 5.2.2</b> sets out the framework for the use of external lighting for the operation of the</p>
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	<p>G. Proposals for or including floodlighting will be permitted provided there is no significant harm to the character of the area, to the amenities of the occupiers of residential property or to areas important for nature conservation. In addition, within the Green Belt floodlighting to illuminate sport and recreation facilities will only be permitted where there is no harm to the openness of the Green Belt.</p> <p><i>Air Pollution</i></p> <p>H. Development will be permitted provided it would not:</p> <ol style="list-style-type: none"> <li>1. Have an adverse impact on health, the natural or built environment or amenity of existing or proposed uses by virtue of odour, dust and/or other forms of air pollution; or</li> <li>2. Be likely to suffer unacceptable nuisance as a result of proximity to existing sources of odour, dust and/or other forms of air pollution.</li> </ol>	<p>Project in compliance with Part F of Policy DP22. The framework sets out objectives for the operational lighting, such as to mitigate impacts associated with lighting on sensitive receptors (such as residents, heritage sites, and local flora and fauna) and to consider energy efficiency in the design and operation of lighting. The design principles which will inform the lighting of the detailed design for the Project are contained in <b>Appendix A1</b> of the <b>Design and Access Statement</b> [<a href="#">APP-257</a>].</p> <p>Overall, it is considered that the Project complies with Policy DP22.</p>
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## 2 References

Tandridge District Council (2008) Tandridge District Core Strategy. Adopted October 2008.

Tandridge District Council (2014) Tandridge Local Plan Part 2: 2014 – 2029. Adopted July 2014.

## 3 Glossary

Term	Description
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
NRP	Northern Runway Project
oLEMP	Outline Landscape and Ecology Management Plan

## Annex E: Local Planning Compliance Table – Mid Sussex District Council

## 1 Local Planning Policy Compliance Tables – Annex E – Mid-Sussex District Council

### 1.1. Introduction

1.1.1 This document comprises a Local Planning Policy Compliance Table in respect of Mid-Sussex District Council's (MSDC) Development Plan, setting out local planning policies that are of relevance to the Northern Runway Project (NRP) and the extent to which the NRP complies with those policies.

1.1.2 As made clear in the **Planning Statement** [\[APP-245\]](#), national policy provides the primary planning policy frameworks for the consideration and determination of the Project. However local planning policy can also be important and relevant. Where any conflicts arise between local and national policy, national planning policy would prevail. **Appendix C** [\[APP-248\]](#) of the Planning Statement contains Planning Policy Compliance Tables which identify and respond to national planning policy.

1.1.3 This document:

- identifies MSDC's local policies which may be relevant to the consideration of the Project, including any specific local policies related to Gatwick Airport; and
- provides a summary of the Project's compliance with MSDC's policies, including cross references to documents forming part of the DCO application where additional detailed information can be found.

1.1.4 This document has also been prepared taking account of the **Joint West Sussex Local Impact Report (LIR)** [\[REP1-068\]](#) prepared by MSDC, together with Crawley Borough Council, West Sussex County Council and Horsham District Council. This document identifies and responds to local policies referenced as relevant in the **Joint West Sussex LIR**.

1.1.5 In line with the **Joint West Sussex LIR** [\[REP1-068\]](#), the policy documents considered in this document comprise:



Adopted Development Plan documents

- Mid-Sussex Local Plan 2004 (Saved Policies)<sup>1</sup>
- Mid-Sussex District Plan 2014-2031 (2018)
- Mid Sussex Site Allocation Development Plan Document (2022)

Emerging Development Plan documents

- Mid Sussex District Plan 2021-2039 (January 2024)<sup>2</sup>

1.1.6 The Project is not located within the administrative area of MSDC.

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<sup>1</sup> No saved policies of the 2004 Local Plan are referenced in the **Joint West Sussex Local Impact Report** [[REP1-068](#)] as relevant to the Project and are therefore not included in this document.

<sup>2</sup> No draft policies in the emerging Mid Sussex District Plan 2021-2039 are referenced in the **Joint West Sussex Local Impact Report** [[REP1-068](#)] as relevant to the Project, other than to confirm the status of the emerging document in para 5.32, and are therefore not included in this document.

Mid-Sussex District Plan 2014-2031 (2018)		
Policy Reference	Policy Description	Compliance Commentary
<b>Quantity and Type of Development</b>		
Policy DP1: Sustainable Economic Development	<p>The total number of additional jobs required within the district over the plan period is estimated to be an average of 543 jobs per year. This will be achieved by:</p> <ul style="list-style-type: none"> <li>• Encouraging high quality development of land and premises to meet the needs of 21st century businesses;</li> <li>• Supporting existing businesses, and allowing them room to expand;</li> <li>• Encouraging inward investment, especially the location, promotion and expansion of clusters or networks of knowledge, creative or high technology industries; and</li> <li>• Seeking the provision of appropriate infrastructure to support business growth – in particular high speed broadband connections.</li> </ul> <p>Provision for new employment land and premises will be made by:</p> <ul style="list-style-type: none"> <li>• Allocating 25 hectares of land as a high quality business park at Burgess Hill to the east of Cuckfield Road;</li> <li>• Allocating further sites within the Site Allocations DPD;</li> </ul>	<p>Policy DP1 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project aligns with the objectives of the first part of Policy DP1 in promoting sustainable economic growth, as demonstrated through the <b>National Economic Impact Assessment [APP-251]</b> and <b>Local Economic Impact Assessment [APP-200]</b>. Alongside this, <b>ES Appendix 17.8.1: Employment, Skills and Business Strategy [APP-198]</b> sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from the Project and will</p>

	<ul style="list-style-type: none"> <li>• Incorporating employment provision within large scale housing development as part of a mixed use development where it is appropriate; and</li> <li>• Allowing new small-scale economic development, in the countryside, including tourism (in accordance with Development in the Countryside policies).</li> </ul>	<p>ensure the local area benefits from new employment opportunities consistent with the policy objective.</p> <p>The Project does not relate to the development of new employment land in MSDC’s jurisdiction and therefore the second part of Policy DP1 is not relevant to the Project.</p>
<p><b>Policy DP2: Town Centre Development</b></p>	<p><u>Town Centres</u> These are defined as the town centres of Burgess Hill, East Grinstead and Haywards Heath which meet the needs of their communities and those of the surrounding large and small villages and countryside areas.</p> <p>To support the regeneration and renewal and environmental enhancement of the town centres as defined on the Policies Map – development, including mixed use and tourism related development, will be permitted providing it:</p> <ul style="list-style-type: none"> <li>• is appropriate in scale and function to its location including the character and amenities of the surrounding area;</li> <li>• has regard to the relevant Town Centre Masterplans and is in accordance with the relevant Neighbourhood Plan.</li> </ul>	<p>Policy DP2 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project does not entail town centre development or development within MSDC’s jurisdiction and therefore Policy DP2 is not relevant to the Project.</p>

Primary Shopping Frontages

Primary shopping frontages are areas considered to be the principal shopping areas, predominantly for retailing. Proposals should enhance the shopping facilities available and not undermine the retail function of the area. Within primary shopping frontages as defined on the Policies Map change of use will be permitted where:

- A clear predominance of Class A1 shop uses would be maintained;
- The nature of the proposed use would sustain and enhance the vitality and viability of the centre; and
- The location and prominence of the proposed use would not lead to a significant break in the continuity of the shopping facilities.

Changes of use to B1a offices or residential use at ground floor level will be resisted.

Secondary Shopping Frontages

Secondary shopping frontages are the smaller areas on the edge of, or beyond, the primary shopping frontages. A high proportion of Class A1 – A5 uses appropriate to a shopping area, which contribute to the pedestrian flow and attractiveness of the area, should be retained. Within secondary shopping frontages as

	<p>defined on the Policies Map change of use will be permitted where:</p> <ul style="list-style-type: none"> <li>• The proposal would sustain and enhance the vitality and viability of the shopping area;</li> <li>• The cumulative effect of non-Class A1 – A5 shop uses is not so great as to undermine the attractiveness of the shopping area.</li> </ul> <p>In exceptional circumstances change of use to B1a office, health or medical use or residential use, at ground floor level, will be permitted where:</p> <ul style="list-style-type: none"> <li>• It can be shown that an A1 – A5 use is no longer viable;</li> <li>• An unacceptable break in the frontage of A1 – A5 uses would not occur; and</li> <li>• The cumulative effect of the proposal would not be so great as to undermine the vitality and viability of the shopping area.</li> </ul> <p>The town centre boundaries and Primary and Secondary Shopping frontages in the three towns are shown on the Policies Map. These may be revised through Neighbourhood Plans for those areas.</p> <p><u>Sequential Test for Town Centre Uses</u></p>	
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	<p>A sequential test must be applied to planning applications for main town centre uses that are not in an existing centre and are not in accordance with the District Plan and the relevant Neighbourhood Plan. The sequential test will require:</p> <ul style="list-style-type: none"> <li>• Applications for main town centre uses to be located in town centres; or, if suitable sites are not available</li> <li>• In edge of centre locations where the site is accessible and well connected to the town centre; or, if suitable sites are not available</li> <li>• At accessible out of centre sites that are well connected to the town centre</li> </ul> <p>Where an application fails to satisfy the sequential test, or fails to meet other requirements of this policy, it should be refused. For the purposes of the sequential test, Neighbourhood Centres do not perform the same function as Town Centres. Proposals in Neighbourhoods should reflect their role in meeting the day to day needs of the local community.</p> <p><u>Local Threshold for Retail Impact Assessments</u>          Planning applications proposing the construction of 500m<sup>2</sup> or more gross floorspace for the sale of convenience or comparison goods outside a town centre must be accompanied by a Retail Impact Assessment in order to demonstrate that they would not</p>	
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	<p>have a significant adverse impact on a town centre, either on their own or cumulatively in the area.</p>	
<p>Policy DP3: Village and Neighborhood Centre Development</p>	<p><u>Village Centres</u> These are defined as the village centres of Crawley Down, Cuckfield, Hassocks, Hurstpierpoint and Lindfield which meet the needs of their own communities and neighbouring small villages and countryside areas.</p> <p>To support the village centres, development, including for mixed uses, will be permitted providing it:</p> <ul style="list-style-type: none"> <li>• helps maintain and develop the range of shops and services to enable the village centre to meet local needs; and</li> <li>• is appropriate in scale and function to its location including the character and amenities of the surrounding area; and</li> <li>• is in accordance with the relevant Neighbourhood Plan.</li> </ul> <p><u>Small Village Centres, Neighbourhood Centres (in the towns)</u> These are defined as the various small village and neighbourhood shopping centres which meet the needs of their own communities and countryside areas. To support these, changes of use from Class A1 shop uses to other uses will be resisted.</p>	<p>Policy DP3 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project does not propose development in village centres or neighbourhood centres in the District and therefore Policy DP3 is not relevant to the Project.</p>

	<p>In exceptional circumstances, a change of use to Class A2, A3, A4, A5 and B1a offices use, health or medical use will be permitted providing:</p> <ul style="list-style-type: none"> <li>• it can be shown that the existing use is no longer viable; and</li> <li>• is appropriate in scale and function to its location including the character and amenities of the surrounding area and will not give rise to increased problems of traffic generation and car parking; and</li> <li>• is in accordance with the relevant Neighbourhood Plan.</li> </ul>	
<p><b>Policy DP4: Housing</b></p>	<p>The District's OAN is 14,892 dwellings over the Plan period. Provision is also made of 1,498 dwellings to ensure unmet need is addressed in the Northern West Sussex Housing Market Area. There is a minimum District housing requirement of 16,390 dwellings between 2014 – 2031.</p> <p>The Plan will deliver an average of 876 dwellings per annum (dpa) until 2023/24. Thereafter an average of 1,090 dpa will be delivered between 2024/25 and 2030/31, subject to there being no further harm to the integrity of European Habitat Sites in Ashdown Forest.</p> <p>The Council commits to commencing preparation of a Site Allocations DPD in 2017 to be adopted in 2020. The DPD will</p>	<p>Policy DP4 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project does not entail new housing development in MSDC's jurisdiction and therefore Policy DP4 is not relevant to the Project.</p>



identify further sites which have capacity of 5 or more residential units. The Council will review the District Plan, starting in 2021, with submission to the Secretary of State in 2023.

<b>District Plan minimum Requirement</b>	<b>16,390</b>
Completions 2014/15	630
Completions 2015/16	868
Completions 2016/17	912
Total Housing Commitments (including sites with planning permission, strategic development at Kings Way, Burgess Hill (DP8) and Pease Pottage (DP10) and allocations in made Neighbourhood Plans)	7,091
<b>Strategic development north and north-west of Burgess Hill</b>	<b>3,500</b>
<b>Land north of Clayton Mills, Hassocks</b>	<b>500</b>
<b>Windfall Allowance</b>	<b>450</b>
<b>Elsewhere in the District, as allocated through future Neighbourhood Plans and the Site Allocations document</b>	<b>2,439</b>

Spatial Distribution of Housing

Settlement Category	Settlements	Minimum Requirement	Minimum Residual from
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		over Plan Period	2017 onwards (accounting for completions and commitments)
1	Burgess Hill, East Grinstead, Haywards Heath	10,653	1,272
2	Copthorne, Crawley Down, Cuckfield, Hassocks and Keymer, Hurstpierpoint and Lindfield	3,005	838
3	Albourne, Ardingly, Ashurst Wood, Balcombe, Bolney, Handcross, Horsted Keynes, Pease Pottage, Sayers Common, Scaynes Hill, Sharpthorne,	2,200	311

	Turners Hill and West Hoathly		
4	Ansty, Staplefield, Slaugham, Twineham and Warninglid	82	19
5	Hamlets such as Birch Grove, Brook Street, Hickstead, Highbrook and Walstead	N/A	N/A2
Windfall:		450	
Total		16,390	2,439
A Housing Trajectory is set out in Appendix A. This will be updated annually through the Monitoring Report.			
Policy DP14: Sustainable rural development and the rural economy	Provided it is not in conflict with Policy DP12: Protection and Enhancement of Countryside and DP13: Preventing Coalescence:		Policy DP14 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.

	<ul style="list-style-type: none"> <li>• new small-scale economic development, including tourism-related development, within the countryside (defined as the area outside of built up area boundaries as per the Policies Map) will be permitted provided:             <ul style="list-style-type: none"> <li>○ it supports sustainable growth and the vitality of the rural economy; and</li> <li>○ where possible, utilises previously developed sites.</li> </ul> </li> <li>• diversification of activities on existing farm units will be permitted provided:             <ul style="list-style-type: none"> <li>○ they are of a scale which is consistent to the location of the farm holding; and</li> <li>○ they would not prejudice the agricultural use of a unit.</li> </ul> </li> <li>• the re-use and adaptation of rural buildings for business or tourism use in the countryside will be permitted provided:             <ul style="list-style-type: none"> <li>○ the building is of permanent construction and capable of re-use without substantial reconstruction or extensive alteration;</li> <li>○ the appearance and setting is not materially altered; and</li> <li>○ it is not a recently constructed agricultural building which has not been or has been little used for its original purpose.</li> </ul> </li> </ul>	<p>The Project does not entail new small-scale economic development, the diversification of existing farms, or the re-use and adaptation of rural buildings in MSDC's jurisdiction. As such, Policy DP14 is not relevant to the Project.</p>
<b>Policy DP16: High Weald Area</b>	Development within the High Weald Area of Outstanding Natural Beauty (AONB), as shown on the Policies Maps, will only be	<b>Policy DP16 is listed in the Joint West Sussex Local Impact Report</b>

<p>of Outstanding Natural Beauty</p>	<p>permitted where it conserves or enhances natural beauty and has regard to the High Weald AONB Management Plan, in particular;</p> <ul style="list-style-type: none"> <li>• the identified landscape features or components of natural beauty and to their setting;</li> <li>• the traditional interaction of people with nature, and appropriate land management;</li> <li>• character and local distinctiveness, settlement pattern, sense of place and setting of the AONB; and</li> <li>• the conservation of wildlife and cultural heritage.</li> </ul> <p>Small scale proposals which support the economy and social well-being of the AONB that are compatible with the conservation and enhancement of natural beauty will be supported.</p> <p>Development on land that contributes to the setting of the AONB will only be permitted where it does not detract from the visual qualities and essential characteristics of the AONB, and in particular should not adversely affect the views into and out of the AONB by virtue of its location or design.</p>	<p><a href="#">[REP1-068]</a> (page70) as forming part of the policy context for the Project.</p> <p>The Project does not entail development in the High Weald AONB in MSDC’s jurisdiction. The Project therefore does not conflict with the first and second parts of Policy DP16.</p> <p>In respect of the final part of Policy DP16, the Project has also been assessed in terms of its potential effects upon AONBs including an assessment of effects on the perception of tranquillity within nationally designated landscapes. The assessment is set out within <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> <a href="#">[APP-033]</a> and <b>Section 8.15</b> of the <b>Planning Statement</b> <a href="#">[APP-245]</a>. The assessment concludes that an increase of up to 20% in overflights compared to the future baseline in 2032 would result in minor adverse</p>
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		<p>effects on perception of tranquility, which is not significant. The Project will therefore not materially affect the positive qualities visitors and nearby residents expect of the AONBs (such as High Weald AONB) including distant scenic views and the landscape’s relative tranquillity and dark skies. The Project therefore does not conflict with the final part of Policy DP16.</p>
<p><b>Policy DP19: Sustainable Tourism</b></p>	<p>Tourism related development in the countryside (defined as the area outside of the built-up area boundaries on the Policies Map), including extensions to existing facilities, visitor accommodation and the re-use of rural buildings will be permitted provided:</p> <ul style="list-style-type: none"> <li>• it supports the sustainable growth of the rural economy; and</li> <li>• maintains or where possible enhances the quality of the rural and landscape character of the District, in accordance with Policy DP12: Protection and Enhancement of the Countryside.</li> </ul> <p>The route of the proposed reinstated railway link between East Grinstead and Haywards Heath railway stations (as shown on the</p>	<p>Policy DP19 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project does not propose tourism related development in MSDC’s jurisdiction or within the land safeguarded for the reinstated railway link between East Grinstead and Haywards Heath railway stations. As such, Policy DP19 is not relevant to the Project.</p>

	<p>Policies Map) will be safeguarded for the Bluebell Railway from any development which could prevent its completion.</p> <p>In particular, land will be safeguarded from development which will be required to deliver the proposed reinstated railway link and associated facilities for the Bluebell Railway along the route of the railway corridor between Horsted Keynes and Haywards Heath railway stations.</p>	
<p>Policy DP21: Transport</p>	<p>Development will be required to support the objectives of the West Sussex Transport Plan 2011-2026, which are:</p> <ul style="list-style-type: none"> <li>• A high quality transport network that promotes a competitive and prosperous economy;</li> <li>• A resilient transport network that complements the built and natural environment whilst reducing carbon emissions over time;</li> <li>• Access to services, employment and housing; and</li> <li>• A transport network that feels, and is, safer and healthier to use.</li> </ul> <p>To meet these objectives, decisions on development proposals will take account of whether:</p> <ul style="list-style-type: none"> <li>• The scheme is sustainably located to minimise the need for travel noting there might be circumstances where</li> </ul>	<p>Policy DP21 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 17.16) as forming part of the policy context for the Project.</p> <p>The <b>Transport Assessment</b> [<a href="#">APP-258</a>] and <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>] provides the assessment of the potential transport impacts of the Project. <b>Section 12.6</b> of <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">APP-037</a>] explains the existing transport network, public transport routes and cycling and walking network in relation to the Project, and <b>Section 12.8</b> sets out</p>

	<p>development needs to be located in the countryside, such as rural economic uses (see policy DP14: Sustainable Rural Development and the Rural Economy);</p> <ul style="list-style-type: none"> <li>• Appropriate opportunities to facilitate and promote the increased use of alternative means of transport to the private car, such as the provision of, and access to, safe and convenient routes for walking, cycling and public transport, including suitable facilities for secure and safe cycle parking, have been fully explored and taken up;</li> <li>• The scheme is designed to adoptable standards, or other standards as agreed by the Local Planning Authority, including road widths and size of garages;</li> <li>• The scheme provides adequate car parking for the proposed development taking into account the accessibility of the development, the type, mix and use of the development and the availability and opportunities for public transport; and with the relevant Neighbourhood Plan where applicable;</li> <li>• Development which generates significant amounts of movement is supported by a Transport Assessment/ Statement and a Travel Plan that is effective and demonstrably deliverable including setting out how schemes will be funded;</li> <li>• The scheme provides appropriate mitigation to support new development on the local and strategic road network, including the transport network outside of the district,</li> </ul>	<p>the mitigation and enhancement measures proposed as part of the Project to increase the use of public transport and provide active travel measures in accordance with Policy DP21.</p> <p>The application is also accompanied by <b>Surface Access Commitments</b> [<a href="#">APP-090</a>] ("SAC") which the Applicant is committed to achieving in relation to surface access at the Airport as part of the Project and its wider package of surface access interventions, beyond MSDC's jurisdiction. The SAC includes commitments in relation to bus and coach services, sustainable transport initiatives, on-site active travel measures and measures to discourage single-occupancy private vehicles, in compliance with aims of Policy DP21.</p> <p>In accordance with Policy DP21, the <b>Transport Assessment</b> [<a href="#">APP-258</a>]</p>
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	<p>secured where necessary through appropriate legal agreements;</p> <ul style="list-style-type: none"> <li>• The scheme avoids severe additional traffic congestion, individually or cumulatively, taking account of any proposed mitigation;</li> <li>• The scheme protects the safety of road users and pedestrians; and</li> <li>• The scheme does not harm the special qualities of the South Downs National Park or the High Weald Area of Outstanding Natural Beauty through its transport impacts.</li> </ul> <p>Where practical and viable, developments should be located and designed to incorporate facilities for charging plug-in and other ultra-low emission vehicles.</p> <p>Neighbourhood Plans can set local standards for car parking provision provided that it is based upon evidence that provides clear and compelling justification for doing so.</p>	<p>also incorporates a Framework Travel Plan that will support the use of public transport and provides active travel measures, and outlines proposals for comprehensive monitoring of the mode share increases. A Travel Plan will also be implemented for construction workers, as part of the wider approach to managing the transport aspects of construction activity. This is set out in <b>ES Appendix 5.3.2: Code of Construction Practice Annex 2 – Outline Construction Workforce Travel Plan</b> <a href="#">[APP-082]</a>, to be secured under Requirement 13 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p> <p>Commentary on the Project’s assessment and potential impacts on the High Weald AONB is provided against Policy DP16.</p> <p>The Project therefore complies with the requirements of Policy DP21</p>
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		<p>where relevant to the proposed works in MSDC's jurisdiction.</p>
<p><b>Policy DP24: Leisure and Cultural Facilities and Activities</b></p>	<p>Development that provides new and/or enhanced leisure and cultural activities and facilities, including allotments, in accordance with the strategic aims of the Leisure and Cultural Strategy for Mid Sussex will be supported.</p> <p>The on-site provision of new leisure and cultural facilities, including the provision of play areas and equipment will be required for all new residential developments, where appropriate in scale and impact, including making land available for this purpose. Planning conditions and/or planning obligations will be used to secure such facilities. Details about the provision, including standards, of new leisure and cultural facilities will be set out in a Supplementary Planning Document.</p> <p>Sites for appropriate leisure and cultural facilities to meet local needs will be identified through Neighbourhood Plans or a Site Allocations Development Plan Document produced by the District Council.</p> <p>Proposals that involve the loss of cultural facilities, open space, sports and recreational buildings and land, including playing fields, will not be supported unless:</p>	<p>Policy DP24 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project does not entail the provision of or of the loss of leisure and cultural facilities, open space, sports or recreational buildings and land in MSDC's jurisdiction. As such, Policy DP24 is not relevant to the Project.</p>

	<ul style="list-style-type: none"> <li>• an assessment has been undertaken which has clearly shown the cultural facility, open space, sports land or recreational building to be surplus to requirements; or</li> <li>• the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or</li> <li>• the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.</li> </ul>	
<p><b>Policy DP25: Community Facilities and Local Services</b></p>	<p>The provision or improvement of community facilities and local services that contribute to creating sustainable communities will be supported.</p> <p>Where proposals involve the loss of a community facility, (including those facilities where the loss would reduce the community’s ability to meet its day-to-day needs locally) evidence will need to be provided that demonstrates:</p> <ul style="list-style-type: none"> <li>• that the use is no longer viable; or</li> <li>• that there is an existing duplicate facility in the locality which can accommodate the impact of the loss of the facility; or</li> <li>• that a replacement facility will be provided in the locality.</li> </ul> <p>The on-site provision of new community facilities will be required on larger developments, where practicable and viable, including</p>	<p>Policy DP25 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project does not propose new, improved or the loss of community facilities within MSDC’s jurisdiction. As such, Policy DP25 is not relevant to the Project.</p>

	<p>making land available for this purpose. Planning conditions and/or planning obligations will be used to secure on-site facilities. Further information about the provision, including standards, of community facilities will be set out in a Supplementary Planning Document.</p> <p>Community facilities and local services to meet local needs will be identified through Neighbourhood Plans or a Site Allocations Development Plan Document produced by the District Council.</p>	
<p>Policy DP29: Noise, Air and Light Pollution</p>	<p>The environment, including nationally designated environmental sites, nationally protected landscapes, areas of nature conservation or geological interest, wildlife habitats, and the quality of people’s life will be protected from unacceptable levels of noise, light and air pollution by only permitting development where:</p> <p><u>Noise pollution:</u></p> <ul style="list-style-type: none"> <li>• It is designed, located and controlled to minimise the impact of noise on health and quality of life, neighbouring properties and the surrounding area;</li> <li>• If it is likely to generate significant levels of noise it incorporates appropriate noise attenuation measures;</li> </ul>	<p>Policy DP29 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 14.48 and pages 150 to 156, 186 to 196) as forming part of the policy context for the Project.</p> <p><u>Noise and Vibration</u> <b>ES Chapter 14: Noise and Vibration [APP-039]</b> provides an assessment of the Project’s potential effects on noise and vibration, as required by Policy DP29. An element of the Project’s proposed mitigation relates to a noise insulation scheme. Full details of the proposed noise</p>

	<p>Noise sensitive development, such as residential, will not be permitted in close proximity to existing or proposed development generating high levels of noise unless adequate sound insulation measures, as supported by a noise assessment are incorporated within the development.</p> <p>In appropriate circumstances, the applicant will be required to provide:</p> <ul style="list-style-type: none"> <li>• an assessment of the impact of noise generated by a proposed development; or</li> <li>• an assessment of the effect of noise by an existing noise source upon a proposed development;</li> </ul> <p><u>Light pollution:</u></p> <ul style="list-style-type: none"> <li>• The impact on local amenity, intrinsically dark landscapes and nature conservation areas of artificial lighting proposals (including floodlighting) is minimised, in terms of intensity and number of fittings;</li> <li>• The applicant can demonstrate good design including fittings to restrict emissions from proposed lighting schemes;</li> </ul> <p><u>Air Pollution:</u></p>	<p>insulation scheme and associated community compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in <b>Section 8.21 of the Planning Statement [APP-245]</b>. These documents confirm that, subject to embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration environment.</p> <p><u>Lighting</u> <b>ES Chapter 8: Landscape, Townscape and Visual Resources [APP-033]</b> considers the potential effects on the landscape arising from construction and operating lighting, informed by <b>ES Appendix 5.2.2: Operational Lighting Framework [APP-077]</b>. <b>ES Appendix 5.2.2</b> sets out the framework for the use of external lighting for the operation of the Project in compliance with Policy DP29. The framework sets out</p>
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- It does not cause unacceptable levels of air pollution;
- Development on land adjacent to an existing use which generates air pollution or odour would not cause any adverse effects on the proposed development or can be mitigated to reduce exposure to poor air quality to recognised and acceptable levels;
- Development proposals (where appropriate) are consistent with Air Quality Management Plans.

The degree of the impact of noise and light pollution from new development or change of use is likely to be greater in rural locations, especially where it is in or close to specially designated areas and sites.

objectives for the operational lighting, such as to mitigate impacts associated with lighting on sensitive receptors (such as residents, heritage sites, and local flora and fauna) and to consider energy efficiency in the design and operation of lighting. The design principles which will inform the lighting of the detailed design for the Project are contained in **Appendix 1 of the Design and Access Statement** (Doc Ref. 7.3).

Air Quality

**ES Chapter 13: Air Quality** [[APP-038](#)] provides an assessment of potential effects on air quality as a result of the Project. The assessment demonstrates that, subject to mitigation measures as set out in Section 13.9 of **ES Chapter 13: Air Quality** and in **ES Appendix 5.3.2: Code of Construction Practice** [[REP1-021](#)], there are not predicted

		<p>to be any significant air quality effects as a result of the Project.</p> <p>These documents confirm that, subject to embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration, air quality and lighting environment. As such, the Project does not conflict with Policy DP29.</p>
<p>Policy DP30: Housing Mix</p>	<p>To support sustainable communities, housing development will:</p> <ul style="list-style-type: none"> <li>• provide a mix of dwelling types and sizes from new development (including affordable housing) that reflects current and future local housing needs;</li> <li>• meet the current and future needs of different groups in the community including older people, vulnerable groups and those wishing to build their own homes. This could include the provision of bungalows and other forms of suitable accommodation, and the provision of serviced self-build plots; and</li> <li>• on strategic sites, provide permanent pitches for Gypsies and Travellers and Travelling Showpeople, as evidenced by the Mid Sussex District Gypsy and Traveller and</li> </ul>	<p>Policy DP30 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming part of the policy context for the Project.</p> <p>The Project does not propose new housing development in MSDC's jurisdiction. As such, Policy DP30 is not relevant to the Project.</p>

	<p>Travelling Showpeople Accommodation Assessment or such other evidence as is available at the</p> <ul style="list-style-type: none"> <li>• time; or the provision of an equivalent financial contribution towards off-site provision</li> <li>• (or part thereof if some on-site provision is made) if it can be demonstrated that a suitable, available and achievable site (or sites) can be provided and made operational</li> <li>• within an appropriate timescale, commensurable with the overall scale of residential</li> <li>• development proposed by the strategic development; and serviced plots for self-build</li> <li>• homes where a need for such accommodation is identified.</li> <li>• If a shortfall is identified in the supply of specialist accommodation and care homes falling within Use Class C2 to meet demand in the District, the Council will consider allocating</li> <li>• sites for such use through a Site Allocations Document, produced by the District Council.</li> </ul> <p>Evidence of housing need will be based on the best available evidence (including local evidence provided to support Neighbourhood Plans).</p>	
<p><b>Policy DP31: Affordable Housing</b></p>	<p>The Council will seek:</p> <ol style="list-style-type: none"> <li>1. the provision of a minimum of 30% on-site affordable housing for all residential developments providing 11</li> </ol>	<p>Policy DP31 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.19) as forming</p>



	<p>dwelling or more, or a maximum combined gross floorspace of more than 1,000m<sup>2</sup>;</p> <ol style="list-style-type: none"> <li>2. for residential developments in the High Weald Area of Outstanding Natural Beauty providing 6 – 10 dwellings, a commuted payment towards off-site provision, equivalent to providing 30% on-site affordable housing;</li> <li>3. on sites where the most recent use has been affordable housing, as a minimum, the same number of affordable homes should be re-provided, in accordance with current mix and tenure requirements;</li> <li>4. a mix of tenure of affordable housing, normally approximately 75% social or affordable rented homes, with the remaining 25% for intermediate homes, unless the best available evidence supports a different mix; and</li> <li>5. free serviced land for the affordable housing.</li> </ol> <p>All affordable housing should be integrated with market housing and meet national technical standards for housing including “optional requirements” set out in this District Plan (Policies DP27: Dwelling Space Standards; DP28: Accessibility and DP42: Water Infrastructure and the Water Environment); or any other such standard which supersedes these.</p> <p>Proposals that do not meet these requirements will be refused unless significant clear evidence demonstrates to the Council’s satisfaction that the site cannot support the required affordable</p>	<p>part of the policy context for the Project.</p> <p>The Project does not propose new housing development in MSDC’s jurisdiction. As such, Policy DP30 is not relevant to the Project.</p>
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	<p>housing from a viability and deliverability perspective. Viability should be set out in an independent viability assessment on terms agreed by the relevant parties, including the Council, and funded by the developer. This will involve an open book approach. The Council's approach to financial viability, alongside details on tenure mix and the provision of affordable housing will be set out in a Supplementary Planning Document.</p> <p>The policy will be monitored and kept under review having regard to the Council's Housing Strategy and any changes to evidence of housing needs.</p>	
<p><b>Policy DP37: Trees, Woodland and Hedgerows</b></p>	<p>The District Council will support the protection and enhancement of trees, woodland and hedgerows, and encourage new planting. In particular, ancient woodland and aged or veteran trees will be protected.</p> <p>Development that will damage or lead to the loss of trees, woodland or hedgerows that contribute, either individually or as part of a group, to the visual amenity value or character of an area, and/ or that have landscape, historic or wildlife importance, will not normally be permitted.</p> <p>Proposals for new trees, woodland and hedgerows should be of suitable species, usually native, and where required for visual, noise or light screening purposes, trees, woodland and</p>	<p>Policy DP37 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.26) as forming part of the policy context for the Project.</p> <p>The Project does not entail the provision of new or the removal of existing trees, woodland, hedgerows and planting in MSDC's jurisdiction. As such, Policy DP37 is not relevant to the Project.</p>

	<p>hedgerows should be of a size and species that will achieve this purpose.</p> <p>Trees, woodland and hedgerows will be protected and enhanced by ensuring development:</p> <ul style="list-style-type: none"> <li>• incorporates existing important trees, woodland and hedgerows into the design of new development and its landscape scheme; and</li> <li>• prevents damage to root systems and takes account of expected future growth; and</li> <li>• where possible, incorporate retained trees, woodland and hedgerows within public open space rather than private space to safeguard their long-term management; and</li> <li>• has appropriate protection measures throughout the development process; and</li> <li>• takes opportunities to plant new trees, woodland and hedgerows within the new development to enhance on-site green infrastructure and increase resilience to the effects of climate change; and</li> <li>• does not sever ecological corridors created by these assets.</li> <li>• Proposals for works to trees will be considered taking into account:             <ul style="list-style-type: none"> <li>• the condition and health of the trees; and</li> </ul> </li> </ul>	
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	<ul style="list-style-type: none"> <li>• the contribution of the trees to the character and visual amenity of the local area; and</li> <li>• the amenity and nature conservation value of the trees; and</li> <li>• the extent and impact of the works; and</li> <li>• any replanting proposals.</li> </ul> <p>The felling of protected trees will only be permitted if there is no appropriate alternative. Where a protected tree or group of trees is felled, a replacement tree or group of trees, on a minimum of a 1:1 basis and of an appropriate size and type, will normally be required. The replanting should take place as close to the felled tree or trees as possible having regard to the proximity of adjacent properties.</p> <p>Development should be positioned as far as possible from ancient woodland with a minimum buffer of 15 metres maintained between ancient woodland and the development boundary.</p>	
<p><b>Policy DP38: Biodiversity</b></p>	<p>Biodiversity will be protected and enhanced by ensuring development:</p> <ul style="list-style-type: none"> <li>• Contributes and takes opportunities to improve, enhance, manage and restore biodiversity and green infrastructure, so that there is a net gain in biodiversity, including through creating new designated sites and locally relevant habitats,</li> </ul>	<p>Policy DP38 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 9.38) as forming part of the policy context for the Project.</p>

	<p>and incorporating biodiversity features within developments; and</p> <ul style="list-style-type: none"> <li>• Protects existing biodiversity, so that there is no net loss of biodiversity. Appropriate measures should be taken to avoid and reduce disturbance to sensitive habitats and species. Unavoidable damage to biodiversity must be offset through ecological enhancements and mitigation measures (or compensation measures in exceptional circumstances); and</li> <li>• Minimises habitat and species fragmentation and maximises opportunities to enhance and restore ecological corridors to connect natural habitats and increase coherence and resilience; and Promotes the restoration, management and expansion of priority habitats in the District; and</li> <li>• Avoids damage to, protects and enhances the special characteristics of internationally designated Special Protection Areas, Special Areas of Conservation; nationally designated Sites of Special Scientific Interest, Areas of Outstanding Natural Beauty; and locally designated Sites of Nature Conservation Importance, Local Nature Reserves and Ancient Woodland or to other areas identified as being of nature conservation or geological interest, including wildlife corridors, aged or veteran trees, Biodiversity Opportunity Areas, and Nature Improvement Areas.</li> </ul>	<p><b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> assesses the effects of the Project on protected species and habitats, informed by site-specific surveys described in <b>Section 9.4</b> and reported in <b>ES Appendix 9.6.2 Ecology Survey Report Parts 1 to 7</b> [APP-123 to APP-130]. <b>ES Chapter 9: Ecology and Nature Conservation</b> <a href="#">[APP-034]</a> has also assessed the Project's effects on statutory and non-statutory designated sites within the search area</p> <p>A number of measures are incorporated into the Project to reduce the potential for impacts on ecology and nature conservation, and to ensure that any localised impacts on habitats for protected species would be avoided. These measures are described in Section 9.8 of <b>ES Chapter 9</b>. Overall, there would not be a significant adverse impact on protected species as a</p>
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	<p>Designated sites will be given protection and appropriate weight according to their importance and the contribution they make to wider ecological networks.</p> <p>Valued soils will be protected and enhanced, including the best and most versatile agricultural land, and development should not contribute to unacceptable levels of soil pollution.</p> <p>Geodiversity will be protected by ensuring development prevents harm to geological conservation interests, and where possible, enhances such interests. Geological conservation interests include Regionally Important Geological and Geomorphological Sites.</p>	<p>result of the mitigation measures and therefore the Project is in accordance with Policy DP38.</p> <p>As it stands, the net gain requirement is not in force for qualifying Nationally Significant Infrastructure Projects (such as this Project) under the Planning Act 2008 regime. Notwithstanding this, the application is accompanied by a <b>ES Appendix 9.9.2 : Biodiversity Net Gain Statement</b> <a href="#">[APP-136]</a>. The statement demonstrates that the Project would deliver a biodiversity net gain of over 20%, therefore well in excess of the 10% requirement that has been introduced by the Government for planning applications under the Town and Country Planning Act 1990 regime. It is also exceeds the aspirations of Policy DP38 to deliver a net gain in biodiversity.</p>
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**Nature and Quality of Development – Sustainable Resources**

<p>Policy DP39: Sustainable Design and Construction</p>	<p>All development proposals must seek to improve the sustainability of development and should where appropriate and feasible according to the type and size of development and location, incorporate the following measures:</p> <ul style="list-style-type: none"> <li>• Minimise energy use through the design and layout of the scheme including through the use of natural lighting and ventilation;</li> <li>• Explore opportunities for efficient energy supply through the use of communal heating networks where viable and feasible;</li> <li>• Use renewable sources of energy;</li> <li>• Maximise efficient use of resources, including minimising waste and maximising recycling/ re-use of materials through both construction and occupation;</li> <li>• Limit water use to 110 litres/person/day in accordance with Policy DP42: Water Infrastructure and the Water Environment;</li> <li>• Demonstrate how the risks associated with future climate change have been planned for as part of the layout of the scheme and design of its buildings to ensure its longer term resilience.</li> </ul>	<p>Policy DP39 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.26) as forming part of the policy context for the Project.</p> <p>The Project does not propose new development in MSDC’s jurisdiction. As such, Policy DP39 is not relevant to the Project.</p>
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<p>Policy DP40: Renewable Energy Schemes</p>	<p>Proposals for new renewable and low carbon energy projects (other than wind energy development – see below), including community-led schemes, will be permitted provided that any adverse local impacts can be made acceptable, with particular regard to:</p> <ul style="list-style-type: none"> <li>• Landscape and visual impacts, including cumulative impacts, such as on the setting of the South Downs National Park and High Weald Area of Outstanding Natural Beauty, and the appearance of existing buildings;</li> <li>• Ecology and biodiversity, including protected species, and designated and non-designated wildlife sites;</li> <li>• Residential amenity including visual intrusion, air, dust, noise, odour, traffic generation, recreation and access.</li> </ul> <p>Assessment of impacts will need to be based on the best available evidence, including landscape capacity studies.</p> <p>Proposals for wind energy development involving one or more wind turbines will only be granted if:</p> <ul style="list-style-type: none"> <li>• the development site is in an area identified as suitable for wind energy development in a Neighbourhood Plan; and</li> <li>• following consultation, it can be demonstrated that the planning impacts identified by affected local communities</li> </ul>	<p>Policy DP40 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.26) as forming part of the policy context for the Project.</p> <p>The Project does not entail new renewable or low carbon energy development in MSDC’s jurisdiction. As such, Policy DP40 is not relevant to the Project.</p>
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	<p>have been fully addressed and therefore the proposal has their backing.</p>	
<p><b>Policy DP41: Flood Risk and Drainage</b></p>	<p>Proposals for development will need to follow a sequential risk-based approach, ensure development is safe across its lifetime and not increase the risk of flooding elsewhere. The District Council’s Strategic Flood Risk Assessment (SFRA) should be used to identify areas at present and future flood risk from a range of sources including fluvial (rivers and streams), surface water (pluvial), groundwater, infrastructure and reservoirs.</p> <p>Particular attention will be paid to those areas of the District that have experienced flooding in the past and proposals for development should seek to reduce the risk of flooding by achieving a reduction from existing run-off rates.</p> <p>Sustainable Drainage Systems (SuDS) should be implemented in all new developments of 10 dwellings or more, or equivalent non-residential or mixed development unless demonstrated to be inappropriate, to avoid any increase in flood risk and protect surface and ground water quality. Arrangements for the long term maintenance and management of SuDS should also be identified. For the redevelopment of brownfield sites, any surface water draining to the foul sewer must be disconnected and managed through SuDS following the remediation of any previously contaminated land.</p>	<p>Policy DP41 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.26) as forming part of the policy context for the Project.</p> <p>In respect of the first part of Policy DP41, a Flood Risk Assessment (FRA) has been submitted and is contained in <b>ES Appendix 11.9.6 [APP-147 to APP-149]</b> and has carried out sequential and exception tests as required by National policy. The FRA provides an assessment of flood risk for the Project, assesses the potential flood effects on external receptors due to the Project and describes the Project’s flood mitigation strategy to mitigate these risks. The FRA demonstrates that it has taken account of climate change impacts, the lifetime of the development and had regard to</p>

	<p>SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that improve public amenities in the area, where possible. The preferred hierarchy of managing surface water drainage from any development is:</p> <ol style="list-style-type: none"> <li>1. Infiltration Measures</li> <li>2. Attenuation and discharge to watercourses; and if these cannot be met,</li> <li>3. Discharge to surface water only sewers.</li> </ol> <p>Land that is considered to be required for current and future flood management will be safeguarded from development and proposals will have regard to relevant flood risk plans and strategies.</p>	<p>recommendations of Strategic Flood Risk Assessments as relevant to the Project. The FRA has therefore been prepared in compliance with Policy DP41.</p> <p>The Project does not propose development or the development of SuDS within MSDC’s jurisdiction. As such, the remainder of Policy DP41 is not relevant to the Project.</p>
<p><b>Policy DP42: Water Infrastructure and the Water Environment</b></p>	<p>New development proposals must be in accordance with the objectives of the Water Framework Directive, and accord with the findings of the Gatwick Sub Region Water Cycle Study with respect to water quality, water supply and wastewater treatment and consequently the optional requirement under Building Regulations – Part G applies to all new residential development in the district. Development must meet the following water consumption standards:</p>	<p>Policy DP42 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 15.26) as forming part of the policy context for the Project.</p> <p>The Project does not propose new development in MSDC’s jurisdiction.</p>

	<ul style="list-style-type: none"> <li>Residential units should meet a water consumption standard of 110 litres per person per day (including external water use);</li> <li>Non-residential buildings should meet the equivalent of a 'Good' standard, as a minimum, with regard to the BREEAM water consumption targets for the development type.</li> </ul> <p>Development proposals which increase the demand for off-site service infrastructure will be permitted where the applicant can demonstrate;</p> <ul style="list-style-type: none"> <li>that sufficient capacity already exists off-site for foul and surface water provision. Where capacity off-site is not available, plans must set out how appropriate infrastructure improvements approved by the statutory undertaker will be completed ahead of the development's occupation; and</li> <li>that there is adequate water supply to serve the development.</li> </ul> <p>Planning conditions will be used to secure necessary infrastructure provision.</p> <p>Development should connect to a public sewage treatment works. If this is not feasible, proposals should be supported by sufficient</p>	<p>As such, Policy DP42 is not relevant to the Project.</p>
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	<p>information to understand the potential implications for the water environment.</p> <p>The development or expansion of water supply or sewerage/sewage treatment facilities will normally be permitted, either where needed to serve existing or proposed new development, or in the interests of long term water supply and waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impacts and that any such adverse impact is minimised.</p>	
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Mid Sussex Site Allocation Development Plan Document (2022)		
Policy Reference	Policy Description	Compliance Commentary
<b>Site Allocations</b>		
<p><b>Policy SA1: Sustainable Economic Development – Additional Site Allocations</b></p>	<p>The strategy for economic development in Mid Sussex is set out in District Plan Policy <b>DP1: Sustainable Economic Development</b> that supports the delivery of an average of 543 jobs per year and allocates 25 hectares of employment land at Burgess Hill to the east of Cuckfield Road to assist meeting this requirement.</p> <p>This policy complements DP1 and allocates 17.45 hectares on seven additional sites for specified employment uses (Table 2.1) and indicated on the policies map. Employment development will be supported at the additional employment site allocations where:</p> <ul style="list-style-type: none"> <li>proposals follow a comprehensive approach involving the community, local planning authority, developer and other key stakeholders; and</li> <li>where development meets the requirements set out within <b>SA GEN: General Principles for Site Allocations</b> and the Policy Requirements (Policies SA 2 to 8) shown on the following pages; and</li> <li>are in accordance with the Development Plan taken as a whole.</li> </ul> <p><b>Table 2.1: Additional Employment Site Allocations</b></p>	<p>Policy SA1 is listed in the <b>Joint West Sussex Local Impact Report [REP1-068]</b> (para 18.20) as forming part of the policy context for the Project.</p> <p>The Project does not entail development within allocated employment sites in MSDC’s jurisdiction. As such, Policy SA1 is not relevant to the Project.</p>

Settlement Type	Settlement / Parish	Policy Reference	Site Name	Employment Uses	Available Development land (hectares)
Category 1 – Town	Burgess Hill	SA2	Burnside Centre, Victoria Road	E(g)/B2	0.96
		SA3	Site of Former KDG, Victoria Road	E(g)/B2/B8	1.1
Category 2 – Larger Village (Local Service Centre)	Copthorne	SA4	Land north of the A264 at Junction 10 of M23	E(g)/B2/B8	2.7
Category 3 – Medium Sized Settlement	Bolney (and part Hurstpierpoint and Sayers Common)	SA5	Land at Bolney Grange Business Park	E(g)/B2/B8	7
		SA6	Marylands Nursery, Cowfolder Road	B8	2.4

		SA7	Cedars, Brighton Road	E(g)/B2/B8	2.3
	Pease Pottage	SA8	Pease Pottage Nurseries, Brighton Road	E(g)/B2/B8	1
<b>Total</b>					<b>17.45</b>

<p>Policy SA10: Housing</p>	<p>The strategy for meeting the housing target for Mid Sussex District is set out within the District Plan Policy <b>DP4: Housing</b> and includes details of strategic allocations, along with a policy framework for development.</p> <p>This policy sets out how the Council will address the residual housing need necessary to fully meet the identified housing target for the District within the plan period.</p> <p>The minimum housing requirement for the Mid Sussex District, including the agreed quantum of unmet housing need to be addressed within the district, is for at least 16,390 dwellings to be delivered in the plan period between 2014 and 2031.</p> <p>Delivery will be at an average of 876 dwellings per annum (dpa) until 2023/24. Thereafter an average of 1,090 dpa will be delivered between 2024/25 and 2030/31.</p> <p>Additional dwellings (for example windfalls) will be delivered through Neighbourhood Plans or through the Development Management Process. The contribution of all sources of housing supply are shown by the following Table (Table 2.3), which updates and supersedes the table set out in District Plan Policy DP4: Housing.</p> <p>The spatial distribution of the housing requirement is in accordance with Table 2.4, which updates and supersedes the table set out in District Plan Policy DP4.</p>	<p>Policy SA10 is listed in the <b>Joint West Sussex Local Impact Report</b> [<a href="#">REP1-068</a>] (para 18.20) as forming part of the policy context for the Project.</p> <p>The Project does not entail new housing development in MSDC’s jurisdiction. As such, Policy SA10 is not relevant to the Project.</p>
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**Table 2.3: District Plan Housing Requirement (updated)**

<b>District Plan minimum Requirement</b>	<b>16,390</b>
Completions 2014/15	630
Completions 2015/16	868
Completions 2016/17	912
Completions 2017/18	843
Completions 2018/19	661
Completions 2019/20	1003
Completions 2020/21	1,116
Total Housing Commitments (including sites with planning permission and allocations in made Neighbourhood Plans)	9, 140
Windfall	420
<b>Residual Housing Requirement</b>	<b>797</b>
<b>Site Allocations – Housing Supply</b>	
<b>Site Allocations DPD - Allocations (SA11)</b>	<b>1,704</b>
<b>Total District Plan period (2014 - 2031) Supply</b>	<b>17,297</b>
Over-supply with the District Plan period 2014 - 2031	+907

**Table 2.4: Spatial Distribution of Housing Requirement**

<b>Settlement category</b>	<b>Settlements</b>	<b>Minimum</b>	<b>Updated Minimum Residual</b>	<b>Site Allocations – Housing</b>
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			<b>Required over Plan Period</b>	<b>Housing Figure</b>	<b>Supply</b>
1 – Town	Burgess Hill East Grinstead Hayward’s Heath	10,653	706	1,379	
2 – Larger Village (Local Service Centre)	Copthorne Crawley Down Cuckfield Hassocks and Keymer Hurstpierpoint Lindfield	3,005	198	105	
3 – Medium Sized Village	Albourne Ardingly Ashurst Wood Balcombe Bolney Handcross Horsted Keynes Pease Pottage Sayers Common Scaynes Hill Sharpthorne Turners Hill West Hoathly	2,200	371	208	
4 – Smaller Village	Ansty Staplefield Slaugham Twineham Warninglid	82	5	12	

	5 – Hamlets	Hamlets such as: Birch Grove Brook Street Hickstead Highbrook Walsted	N/A *	N/A *	N/A *	
	<b>Total</b>		<b>16,390**</b>	<b>1,280</b>	<b>1,704</b>	
	* Assumed windfall growth only ** including windfalls of 450 dwellings as identified in the District Plan (now updated to 504 dwellings)					

<p>Policy SA11: Additional Housing Allocations</p>	<p>In addition to the strategic site allocations set out in District Plan Policy DP4: Housing, development will be supported at the additional site allocations, through a comprehensive approach involving the community, local planning authority, developer and other stakeholders, where development meets the requirements set out within the Policy Requirements <b>SA12 to 33, SA GEN: General Principles for Site Allocations</b> and are in accordance with the Development Plan read as whole. Table 2.5 below shows how the level of housing required through the Site Allocations DPD will be distributed:</p> <p><b>Table 2.5: Sites DPD Housing Allocations</b></p> <p><i>Table as listed in the Site Allocations DPD</i></p>	<p>Policy SA11 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.20) as forming part of the policy context for the Project.</p> <p>The Project does not entail new housing development in MSDC’s jurisdiction. As such, Policy SA10 is not relevant to the Project.</p>
<p><b>Development Policies</b></p>		
<p>Policy SA34: Existing Employment Sites</p>	<p><u>Existing Employment Sites – Protection, Intensification and Redevelopment</u></p> <p>Existing Employment Sites, classified as those in use classes E(g): Business, B2: General Industrial or B8: Storage or Distribution (as shown in Appendix A and on the policies map) are protected; proposals that would involve their loss will be resisted. Proposals on Existing Employment Sites that would involve the loss of employment land or premises will only be supported where it can be clearly demonstrated by the applicant that the site/premises are no longer needed and/or viable for employment use.</p>	<p>Policy SA34 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 18.20) as forming part of the policy context for the Project.</p> <p>The Project does not entail the development or expansion or existing employment sites. As</p>

	<p>Development proposals outside the traditional employment use classes for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses, is not viable, through the provision of:</p> <ul style="list-style-type: none"> <li>(i) Details of comprehensive marketing of the site for at least 12 months and appropriate to the prevailing marketing conditions; and</li> <li>(ii) A financial appraisal that demonstrates that the development of any employment generating use is unviable.</li> </ul> <p>Development proposals outside the traditional employment use classes for non-employment generating uses will be supported on existing and allocated employment sites, if it is demonstrated that the continued use of the site, or its development for employment or employment uses causes, or would lead to site-specific, environmental problems, such as noise, pollution or disturbance through traffic generation, recognising the environmental benefits to be gained by redeveloping these sites for non-employment generating uses.</p> <p>Proposals for intensification within the boundary of Existing Employment Sites will be supported providing it is in accordance with other development plan and national policies.</p>	<p>such, Policy SA34 is not relevant to the Project.</p>
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	<p>Redevelopment for employment use within the boundary of Existing Employment Sites (as shown in Appendix A and on the Policies Map) will be supported where it does not result in the overall loss of employment floorspace. Proposals for alternative uses, with the exception of residential use, within Existing Employment Sites will only be supported where it can be demonstrated that the sequential approach has been applied to the redevelopment of the site, and the proposals support their integrity and function as centres of employment.</p> <p><u>Existing Employment Areas – Expansion</u></p> <p>Within the built-up area, expansion of Existing Employment Sites and premises for E(g)/B2/B8 uses will be supported where the business requirements cannot be met within the existing site/premises through acceptable on-site expansion or intensification; and that relocation to existing stock is not preferable.</p> <p>Outside the built-up area, expansion of Existing Employment Sites for E(g)/B2/B8 uses will only be supported where:</p> <ul style="list-style-type: none"> <li>• Detailed layout and design are in keeping with its countryside location</li> <li>• The expansion is contiguous with the boundary of an existing employment site</li> </ul>	
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	<ul style="list-style-type: none"> <li>Where the impacts of expansion are assessed in-combination with the existing site, and the overall impact of existing plus expansion is considered acceptable.</li> </ul>	
<b>Policy SA38: Air Quality</b>	<p>The Council will require applicants to demonstrate that there is not unacceptable impact on air quality. The development should minimise any air quality impacts, including cumulative impacts from committed developments, both during the construction process and lifetime of the completed development, either through a redesign of the development proposal or, where this is not possible or sufficient, through appropriate mitigation.</p> <p>Where sensitive development is proposed in areas of existing poor air quality and/ or where major development is proposed, including the development types set out in the Council’s current guidance (Air Quality and Emissions Mitigation Guidance for Sussex (2019 or as updated)) an air quality assessment will be required.</p> <p>Development proposals that are likely to have an impact on local air quality, including those in or within relevant proximity to existing or potential Air Quality Management Areas (AQMAs), will need to demonstrate measures/ mitigation that are incorporated into the design to minimise any impacts associated with air quality.</p> <p>Mitigation measures will need to demonstrate how the proposal would make a positive contribution towards the aims of the Council’s Air Quality</p>	<p>Policy SA38 is listed in the <b>Joint West Sussex Local Impact Report</b> <a href="#">[REP1-068]</a> (para 13.31 and pages 150 to 156) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> provides an assessment of potential effects on air quality as a result of the Project. The assessment demonstrates that, subject to mitigation measures as set out in Section 13.9 of <b>ES Chapter 13: Air Quality</b> and in <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-021]</a>, there are not predicted to be any significant air quality effects as a result of the Project.</p>

	<p>Action Plan and be consistent with the Council’s current guidance as stated above.</p> <p>Mitigation measures will be secured either through a negotiation on a scheme, or via the use of planning condition and/ or planning obligation depending on the scale and nature of the development and its associated impacts on air quality.</p> <p>In order to prevent adverse effects on the Ashdown Forest SPA and SAC, new development likely to result in increased traffic may be expected to demonstrate how any air quality impacts, including in combination impacts, have been considered in relation to the Ashdown Forest SAC. Any development likely to have a significant effect, either alone or in combination with other development, will be required to demonstrate that adequate measures are put in place to avoid or mitigate for any potential adverse effects.</p>	<p>As such, the Project does not conflict with Policy SA38.</p>
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## 2 References

Mid Sussex District Council (2004) Local Plan 2004 Saved Policies. Adopted 2004 and policies saved 2007.

Mid Sussex District Council (2018) Mid Sussex District Plan 2014 – 2031. Adopted March 2018.

Mid Sussex District Council (2022) Site Allocations Development Plan Document. Adopted July 2022.

Mid Sussex District Council (2024) Mid Sussex District Plan 2021 – 2039: Submission Draft (Regulation 19). Regulation 19 Consultation 12<sup>th</sup> January to 23<sup>rd</sup> February 2024.

## 3 Glossary

Term	Description
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
NRP	Northern Runway Project
oLEMP	Outline Landscape and Ecology Management Plan

## Annex F: Local Planning Compliance Table – Reigate and Banstead Borough Council

## 1 Local Planning Policy Compliance Tables – Annex F – Reigate and Banstead Borough Council

### 1.1. Introduction

1.1.1 This document comprises a Local Planning Policy Compliance Table in respect of Reigate and Banstead Borough Council's (RBBC) Development Plan, setting out local planning policies that are of relevance to the Northern Runway Project (NRP) and the extent to which the NRP complies with those policies.

1.1.2 As made clear in the **Planning Statement** [\[APP-245\]](#), national policy provides the primary planning policy framework for the consideration and determination of the Project, however local planning policy can also be important and relevant. Where any conflicts arise between local and national policy, national planning policy would prevail. **Appendix C** [\[APP-248\]](#) of the Planning Statement contains Planning Policy Compliance Tables which identify and respond to national planning policy.

1.1.3 This document:

- identifies RBBC's local policies which may be relevant to the consideration of the Project, including any specific local policies related to Gatwick Airport; and
- provides a summary of the Project's compliance with RBBC's policies, including cross references to documents forming part of the DCO application where additional detailed information can be found.

1.1.4 This document has also been prepared taking account of the **Joint Surrey Councils Local Impact Report** (LIR) [\[REP1-097\]](#) prepared by RBBC, together with Surrey County Council, Mole Valley District Council and Tandridge District Council. This document identifies and responds to local policies referenced as relevant in the **Joint Surrey Councils LIR**.

1.1.5 In line with the **Joint Surrey Councils LIR** [[REP1-097](#)], the policy documents considered by this document comprise:

- Reigate and Banstead Local Plan: Core Strategy (adopted July 2014)
- Reigate and Banstead Local Plan: Development Management Plan (adopted September 2019)

1.1.6 The planning policy designations that apply to land within the Project's Order Limits that fall within RBBC administrative boundary are identified on the **Planning Policy Plan** contained in **Planning Statement Appendix B** (Doc Ref. 7.1).

1.1.7 The extent of works proposed by the Project relate to surface access works on the A23 (associated with the Longbridge Bridge roundabout surface access works in Mole Valley District), part of the Longbridge Roundabout (Church Meadow) replacement open space (the remainder being in Mole Valley District) and works to the north of the A23 / M23 including the Car Park B North replacement open space and the works associated to the A23 / M23 surface access works. In accordance with RBBC's adopted Policies Map<sup>1</sup>:

- The area of the Longbridge Roundabout replacement open space in RBBC's jurisdiction is within the Church Road (Horley) Conservation Area and designated Urban Open Space and Riverside Green Chain;
- To the east of the railway works and to the north of the A23 / South Terminal roundabout, the Project boundary is within a Strategic Employment Site and the Gatwick Open Setting designation; and
- To the north of the M23, the Project boundary encroaches into the Gatwick Open Setting and Rural Surrounds of Horley designations.

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<sup>1</sup> [https://maps.reigate-banstead.gov.uk/custom/atMobileSoloMap\\_dmppolicymap\\_new.html?\\_gl=1\\*19m1h86\\*\\_ga\\*MzI2ODU1Mjc2LjE3MDk1NDQ3ODk.\\*\\_ga\\_6HF8FD0Y4J\\*MTcxMjg2MDY1OC4yMi4xLjE3MTI4NjA2NzYuNDluMC41MzI2Nzc2ODk](https://maps.reigate-banstead.gov.uk/custom/atMobileSoloMap_dmppolicymap_new.html?_gl=1*19m1h86*_ga*MzI2ODU1Mjc2LjE3MDk1NDQ3ODk.*_ga_6HF8FD0Y4J*MTcxMjg2MDY1OC4yMi4xLjE3MTI4NjA2NzYuNDluMC41MzI2Nzc2ODk).

Reigate and Banstead Local Plan: Core Strategy (2014)		
Policy Reference	Policy Description	Compliance Commentary
<b>The Spatial Strategy</b>		
Policy CS2: Valued landscapes and the natural environment	<p>1. In considering the allocation of land and / or proposals for significant development, the Council and developers will be required to protect and enhance the borough's green fabric.</p> <p>a. The Surrey Hills Area of Outstanding Natural Beauty (AONB) is a landscape of national importance and therefore will be provided with the highest level of protection. The same principles will be applied to protect the AGLV as an important buffer to the AONB and to protect views from and into the AONB, until such time as there has been a review of the AONB boundary.</p> <p>b. All areas of countryside have their own distinctive landscape character. The landscape character of the countryside outside the current (or revised) AONB boundary will be protected and enhanced through criteria based policies in the DMP including, if and where appropriate, new local landscape designations. In those areas of countryside allocated for development, policies will be included in the DMP in</p>	<p>Policy CS2 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 6.29, 7.28 and 17.12 and page 78) as forming part of the policy context for the Project.</p> <p>The Project has been assessed in terms of its potential effects upon Areas of Outstanding Natural Beauty (AONB). The assessment is set out within <b>ES Chapter 8: Townscape, Landscape and Visual Resources</b> [<a href="#">APP-033</a>] and <b>Section 8.15</b> of the <b>Planning Statement</b> [<a href="#">APP-245</a>]. <b>ES Chapter 8</b> has also taken account of the respective AONB Management Plans, as detailed in Section 8.6.</p> <p><b>ES Chapter 8</b> also includes an assessment of effects on the perception of tranquillity within nationally designated landscapes. The assessment concludes</p>

	<p>relation to the design and siting of development to minimise the impact on landscape character.</p> <p>c. The borough’s commons will be maintained and enhanced for the benefits of farming, public access and biodiversity.</p> <p>d. The Mole Gap to Reigate Escarpment SAC will be afforded the highest level of protection in line with European legislation. Proposals for development that is likely to have a significant effect on the SAC, alone or in combination with other development, will be required to demonstrate that it will not adversely affect the integrity of the site.</p> <p>e. Sites of Special Scientific Interest (SSSIs), Sites of Nature Conservation Importance (SNClS), Local Nature Reserves (LNRs) and ancient woodland will be protected for their biodiversity value and where appropriate enhanced.</p> <p>f. Urban green spaces, green corridors and site specific features which make a positive contribution to the green fabric and/or a coherent green infrastructure network and will, as far as practicable, be retained and enhanced.</p> <p>2. The Council will work with a range of partners to promote, enhance and manage a substantial network of multi-functional green infrastructure across the borough, to maximise the social, economic and environmental benefits of the borough’s green fabric.</p>	<p>that an increase of up to 20% in overflights compared to the future baseline in 2032 would result in minor adverse effects on perception of tranquility, which is not significant. The Project will therefore not materially affect the positive qualities visitors and nearby residents expect of the AONBs (such as Surrey Hills), including distant scenic views and the landscape’s relative tranquillity and dark skies. As such, the Project does not conflict with Parts 1(a) and (b) of Policy CS2.</p> <p>The Project is not located within a ‘common’ in RBBC and therefore Part 1(c) of Policy CS2 is not relevant to the Project.</p> <p>In respect of parts 1(d) to (e), <b>ES Chapter 9</b> [APP-034] identifies and considers the effects of the NRP on statutory and non-statutory designated sites within the assessment’s search areas, namely in Section 9.6. This list includes The Roughs Site of Nature Conservation Importance (SNCl) and ancient woodland within RBBC’s jurisdiction. <b>Section 9.9 of ES Chapter 9</b> and <b>ES Appendix 9.9.1:</b></p>
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		<p><b>Habitat Regulations Assessment Report</b> [APP-134 to APP-135] considers the potential for effects on European designated sites.</p> <p>The Project does not propose any physical change or works to any designated site or ancient woodland.</p> <p>Due to the distance of international, national and local statutory designated sites and the Project's mitigation measures, it is assessed that there would be no impact from construction or long-term from operation. Similarly, no impacts are anticipated to arise from the Project's construction on non-statutory designated sites within RBBC's jurisdiction (e.g. The Roughs SNCI), owing to the proposed mitigation measures, and no new or continuing operational effects by 2047.</p> <p>On this basis, the Project does not conflict with Parts 1(d) to (e) of Policy CS2.</p> <p>An assessment of the character of the site and its surroundings, contained in <b>ES</b></p>
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		<p><b>Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>], informed the design development of the Project and mitigation measures, taking account of designated sites and existing green infrastructure. <b>ES Chapter 8</b> sets out the embedded or mitigation measures proposed as part of the Project, and which has informed the landscaping principles and concept designs contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> (Doc Ref. 5.3). On this basis, the Project has been developed in line with the objectives of Part 2 of Policy CS2, albeit it is a policy objective directed at RBBC rather than Applicants.</p>
<p>Policy CS4: Valued townscapes and the historic environment</p>	<ol style="list-style-type: none"> <li>1. Development will be designed sensitively to respect, conserve, and enhance the historic environment, including heritage assets and their settings. Development proposals that would provide sensitive restoration and re-use for heritage assets at risk will be particularly encouraged.</li> <li>2. Development will respect, maintain and protect the character of the valued townscapes in the borough, showing consideration for any detailed design</li> </ol>	<p>Part 1 of Policy CS4 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 5.22) as forming part of the policy context for the Project.</p> <p>The Church Road (Horley) Conservation Area is located to the north of the Project boundary, with a small part of the</p>



	<p>guidance that has been produced by the Council for specific built-up areas of the borough. Proposals will:</p> <ul style="list-style-type: none"> <li>a. Reflect high standards of sustainable construction in line with policy CS11</li> <li>b. Be of a high quality design which takes direction from the existing character of the area and reflects local distinctiveness</li> <li>c. Be laid out and designed to make the best use of the site and its physical characteristics, whilst minimising the impact on surrounding properties and the environment</li> <li>d. Protect and where appropriate enhance existing areas of biodiversity value and the links between them.</li> </ul>	<p>Conservation Area falling within the Project site boundary.</p> <p>The works within the Conservation Area relate to the Longbridge Roundabout replacement open space and a small section of works associated with the active travel and surface access improvements to Longbridge Roundabout, namely the provision of a shared use path for pedestrians and cyclists, a cyclist ramp to the carriageway and a highway ditch and culvert. Adjacent to the Conservation Area to the west, the land is proposed to be used for a contractor compound on a temporary basis and then replacement open space.</p> <p>The establishment and use of the environmental mitigation area at Longbridge Roundabout would slightly enhance the significance of the Church Road (Horley) Conservation Area. This would be a result of increased public access and the creation (on the west side of the river) of an area for informal recreational use, and also through the</p>
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		<p>provision of information boards on the west side of the River Mole in this location that will describe the historical features of the area. The additional planting along the south-eastern edge of the Conservation Area would also help over time in screening out views of buildings and other elements associated with the airport. These elements for the detailed design are secured through <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> (Doc Ref. 5.3) setting out the overarching vision for the landscape proposals within the Project and includes proposed improvements to Church Meadows.</p> <p>The Project therefore complies with Part 1 of Policy CS4.</p> <p>Part 2 is not responded to on the basis it is not listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] as forming part of the policy context for the Project.</p>
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<p>Policy CS5: Valued people and economic development</p>	<ol style="list-style-type: none"> <li>1. The Council will promote and support continued sustainable economic prosperity and regeneration in Reigate &amp; Banstead by:             <ol style="list-style-type: none"> <li>a. Identifying, targeting and working to improve the priority Regeneration Areas, where development and growth can deliver economic, social and environmental improvements to those areas and the people who live in them</li> <li>b. Sustaining those areas of the borough which already prosper by supporting communities and improving infrastructure and community facilities to meet their needs</li> <li>c. Recognising and nurturing the distinctive economic role of different parts of the borough (in particular raising the profile of Redhill as a commercial location), and working with adjoining authorities and other partners to maximise the opportunities arising from our position within the Gatwick Diamond, the Coast to Capital Local Enterprise Partnership, Surrey Connects and our proximity to London</li> <li>d. Planning for a range of types and sizes of employment premises to cater for the needs of established, growing and start-up businesses; and ensuring sufficient flexibility to meet their changing needs and attract new businesses</li> </ol> </li> </ol>	<p>Policy CS5 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (paras 15.40 and 16.17 and page 287) as forming part of the policy context for the Project.</p> <p>This policy sets out the aims and aspirations of RBBC in promoting sustainable economic growth and regeneration in the Borough, rather than policy requirements of new developments. Notwithstanding this, the Project is considered to align with the aim of Policy CS5 through <b>ES Appendix 17.8.1: Employment, Skills and Business Strategy</b> <a href="#">[APP-198]</a>. The strategy sets out measures to enable the local workforce to attain skills relevant to employment opportunities arising from the Project and will ensure the local area benefits from new employment opportunities consistent with the policy objective. It also explains GAL's work with Gatwick Diamond, Coast to Capital Local Enterprise Partnership and other bodies such as the Sussex and Surrey Institute of Technology.</p>
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	<ul style="list-style-type: none"> <li>e. Planning for the delivery of additional employment floorspace to meet the forecast growth needs of the borough, by:             <ul style="list-style-type: none"> <li>(i) focusing on retaining and making the best use of existing employment land, particularly within town centres and industrial areas unless it can be demonstrated that there is no reasonable prospect of a site being used for that purpose over the life of the plan; and</li> <li>(ii) ensuring that any new employment development outside these areas reflects wider policy priorities and is located in accordance with sustainability principles.</li> </ul> </li> <li>f. Supporting entrepreneurship and innovation by facilitating the provision of affordable start-up/ incubator units in the most accessible locations.</li> </ul> <p>2. The Council will:</p> <ul style="list-style-type: none"> <li>a. Work with partners such as Surrey County Council, health providers and neighbouring authorities to deliver improved health facilities and access to healthier lifestyles</li> <li>b. Work with partners such as Surrey County Council, skills providers including East Surrey College and neighbouring authorities to promote and deliver improved education facilities and increased education opportunities including</li> </ul>	<p>The Project therefore complies with the objectives of Policy CS5.</p>
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	<p>support for identifying and developing vocational and skills improvement facilities in the borough</p> <p>c. Empower, support, and actively work with local communities, as part of the Local Community Action Plan (LCAP) process and to facilitate neighbourhood planning</p>	
<b>Shaping our Places</b>		
<p>Policy CS8: Area 3 (The Low Weald)</p>	<p>1. The scale and location of development</p> <p>Housing:</p> <ul style="list-style-type: none"> <li>• Within the urban area – at least 2,440 by 2027</li> <li>• Horley North West Sector – 1,570 by 2027</li> <li>• Sustainable Urban Extensions – up to 200 by 2027</li> </ul> <p>Employment:</p> <ul style="list-style-type: none"> <li>• Additional employment development predominantly through reuse and intensification of existing employment land – approximately 24,000sqm by 2027</li> </ul> <p>Retail:</p> <ul style="list-style-type: none"> <li>• Horley town centre – comparison (at least 3,870sqm) and convenience (at least 2,340sqm) by 2027</li> </ul> <p>2. Infrastructure priorities</p> <ul style="list-style-type: none"> <li>• Drainage and flood prevention measures to allow the development of the NE and NW sectors – to reduce on- and off- site flood risks and ensure that new</li> </ul>	<p>Policy CS8 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.40) as forming part of the policy context for the Project.</p> <p>Part 1 of Policy CS8 relates to housing, employment and retail development in the Borough which is not applicable to the Project.</p> <p>Part 2 of Policy CS8 relates to infrastructure priorities in the Borough applicable to the Horley North West and North East Sector developments, which are not applicable to the Project.</p>

	<p>development is protected from flood risk and does not cause downstream flooding</p> <ul style="list-style-type: none"> <li>• Floodplain compensation – to reduce on- and off- site flood risks and ensure that new development is protected from flood risk and does not cause downstream flooding</li> <li>• New access routes to NE and NW sector – to provide access to, and avoid congestion on, the existing highway network</li> <li>• Provision of a comprehensive playing space for sport facility – to provide sports and playing facilities for the residents of the NE and NW sector</li> <li>• Riverside Green Chain open space and/or permissive public access linking the chain – to safeguard the river environment, provide recreation space and sustainable pedestrian and cycle routes</li> <li>• Two new neighbourhood centres and community facilities in the NE and NW sectors – to provide facilities in a sustainable location to support the new communities</li> <li>• Play space and play facilities within the NE and NW sectors – to provide for the leisure needs of existing and future residents</li> <li>• Provision of two new 1-form entry primary schools – to accommodate forecast increase in primary school pupil numbers</li> </ul>	
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	<ul style="list-style-type: none"> <li>• Enhancement to Oakwood Secondary School – to accommodate forecast increase in secondary school pupil numbers</li> <li>• New leisure centre – to provide for the leisure needs of existing and future residents</li> <li>• Bus priority route corridors, bus/rail interchange and enhanced bus service – to increase travel opportunities for residents and support modal shift towards sustainable forms of transport</li> </ul>	
<p><b>Policy CS9: Gatwick Airport</b></p>	<p>The Council will support the development of Gatwick Airport, within the existing airport boundary and existing legal limits, including the development of facilities that contribute to the safe and efficient operation of the airport.</p>	<p>Policy CS9 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 3.31 and pages 142 to 159) as forming part of the policy context for the Project.</p> <p>The NRP proposals are largely within the confines of the existing boundary of Gatwick Airport, as shown in the <b>Glossary</b> [<a href="#">APP-004</a>].</p> <p>Works proposed outside the existing Airport boundary relate to the surface access improvement works, environmental mitigation areas and water treatment works. These works are necessary to provide a comprehensive development</p>

		<p>that enables the safe and efficient operation of the airport together with suitable environmental mitigation. They also help to address an existing lack of capacity at the Longbridge junction.</p> <p>As such, while the Project does not benefit from the presumption of Council support under Policy CS9, the Project does not fundamentally conflict with Policy CS9.</p>
<b>Cross cutting policies</b>		
<p><b>Policy CS10: Sustainable Development</b></p>	<p>Development will:</p> <ol style="list-style-type: none"> <li>1. Make efficient use of land, giving priority to previously developed land and buildings within the built-up areas.</li> <li>2. Be at an appropriate density, taking account of and respecting the character of the local area and levels of accessibility and services.</li> <li>3. Contribute to the creation of neighbourhoods which are supported by effective services, infrastructure and transport options and which are designed to be safe, secure and socially inclusive.</li> </ol>	<p>Policy CS10 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 8.11, 11.21, 12.48 and 13.29 and pages 142 to 159, 186 to 189 and 232 to 240) as forming part of the policy context for the Project.</p> <p>A response is provided to each part of Policy CS10. Where relevant, the response refers to commentary against other Core Strategy policies where details of compliance with Policy CS10 is captured in responses to other policies.</p>



	<ol style="list-style-type: none"> <li>4. Protect and enhance the green fabric, and respect and contribute to the borough's green infrastructure network.</li> <li>5. Respect the ecological and cultural heritage of the borough including the historic environment.</li> <li>6. Minimise the need to travel, whilst increasing opportunities to walk, cycle or use public transport, including as part of the green infrastructure network.</li> <li>7. Minimise the use of natural resources and contribute to a reduction in carbon emissions by re-using existing resources, maximising energy efficiency, minimising water use, and reducing the production of waste, including through sustainable construction methods. Encourage renewable energy/fuel production whilst ensuring that adverse impacts are addressed, including on landscape, wildlife, heritage assets and amenity.</li> <li>8. Be designed to minimise pollution, including air, noise and light, and to safeguard water quality.</li> <li>9. Be designed reflecting the need to adapt to the impacts of climate change (for example higher temperatures, increased flooding, increased pressure on water resources, impacts on ecology and built heritage and impacts on ground conditions).</li> <li>10. Be located to minimise flood risk, through the application of the Sequential Test and where necessary the Exception Test, taking account of all</li> </ol>	<ul style="list-style-type: none"> <li>• Part 1 – the works within RBBC's jurisdiction are limited to works associated to the existing highway and to deliver replacement open space, and therefore do not conflict with Part 1 of Policy CS10.</li> <li>• Part 2 – the works within RBBC's jurisdiction do not relate to the new buildings and therefore the matter of density in Part 2 of Policy CS10 is not applicable to the Project.</li> <li>• Part 3 – commentary on the delivery of infrastructure by the Project is provided against Policy CS12.</li> <li>• Part 4 – commentary on the Project's relationship to the nature environment and green infrastructure is provided against Policy CS2.</li> <li>• Part 5 – commentary on the Project's relationship to the historic environment is provided against Policy CS4.</li> <li>• Part 6 – commentary on how the Project increases opportunities for walking, cycling and using public</li> </ul>
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	<p>sources of flooding including fluvial, surface water, sewer and pluvial flooding, and reservoir failure, and manage flood risk through the use of SuDS and flood resistant/resilient design features, and where necessary provide floodplain compensation.</p> <p>The criteria within this policy, along with policy CS6, will guide the allocation of sites through the DMP.</p>	<p>transport is provided against Policy CS17.</p> <ul style="list-style-type: none"> <li>• Part 7 – commentary relating to sustainable construction is provided against Policy CS11.</li> <li>• Part 8 – commentary on the Project’s assessment of air, noise and water is provided against Policy DES9.</li> <li>• Part 9 – <b>ES Chapter 15: Climate Change</b> <a href="#">[APP-040]</a> assesses potential climate change impacts on the Project. The resilience of the design, construction and operation of the Project against projected future climate change impacts is assessed in the Climate Change Resilience Assessment contained in <b>ES Appendix 15.8.1</b> <a href="#">[APP-187]</a>. This takes account of embedded and mitigation measures proposed as part of the Project, including soft landscaping and drainage proposals and the design principles secured under <b>Appendix 1</b> of the <b>Design and Access Statement</b> (Doc Ref. 7.3).</li> </ul>
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<p>Policy CS11: Sustainable Construction</p>	<ol style="list-style-type: none"> <li>The Council will expect new development to be constructed to the following standards (taking into account the overall viability of the proposed development at the time the application is made):             <ol style="list-style-type: none"> <li>New housing: to a minimum of Code for Sustainable Homes Level 4, or future nationally described standards (justified by local evidence if required). To achieve Level 4, the Council may require (through the DMP) or encourage (through supplementary guidance) minimum standards for some tradeable Code elements to be provided in particular locations or for particular types of housing development.</li> <li>Relevant non-residential development of new or replacement buildings, or extensions to existing structures: to a minimum of BREEAM 'very good'.</li> </ol> </li> </ol>	<p>Policy CS11 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 13.30 and page 253) as forming part of the policy context for the Project.</p> <p>Part 1 of Policy CS11 is not applicable to the Project in that the works within RBBC's jurisdiction do not comprise the development of new housing, non-residential buildings, replacement or extensions.</p> <p>Part 2 of Policy CS11 relates to RBBC's aim to encourage the development of decentralized and renewable or low carbon energy developments, which is not proposed by the Project elements within RBBC's jurisdiction. As such, this part of</p>

	<ol style="list-style-type: none"> <li>2. The Council will work with developers and other partners to encourage and promote the development of decentralised and renewable or low carbon energy (including combined heat and power) as a means to help future development meet zero-carbon standards affordably.             <ol style="list-style-type: none"> <li>a. Where a major development is planned that generates, is within, or is adjacent to an area of significant heat density, it will be expected that the potential to create, or connect to, a district heating network is fully investigated. Such developments will be identified in the DMP where possible.</li> <li>b. Where a district heat network exists or is planned, or where there is potential to utilise waste heat, the Council may require - where feasible and viable - development in these areas to be designed to facilitate its use and connect to it.</li> </ol> </li> </ol>	<p>Policy CS11 is not applicable to the Project.</p> <p>Notwithstanding this, <b>ES Appendix 5.4.2: Carbon Action Plan</b> <a href="#">[APP-091]</a> describes the actions that the Applicant would take to reduce carbon impacts within its control. As part of this, the Carbon Action Plan contains the Applicant’s commitments to reduce ABAGO emissions, comprising the emissions arising from the energy use of buildings, infrastructure and operations. The detailed design of the Project will be subject to the relevant planning authority’s approval in line with the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</p>
<p><b>Policy CS12: Infrastructure Delivery</b></p>	<p>The Council will:</p> <ol style="list-style-type: none"> <li>1. Secure contributions from new development towards the infrastructure required to meet the needs created by the new development.</li> <li>2. Require infrastructure to be provided either ahead of, or alongside, the delivery of new development.</li> </ol>	<p>Policy CS12 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (para 17.12) as forming part of the policy context for the Project.</p> <p>Compliance with each part in Policy CS12 is set out below:</p>

	<ol style="list-style-type: none"> <li>3. Encourage proposals that would:             <ol style="list-style-type: none"> <li>a. increase the range, improve the quality, or enhance the accessibility, of community and leisure (including sport, recreation, and cultural) facilities in the borough, and/or</li> <li>b. provide for a mix of compatible community services on a single site, including through consolidation to result in economies of scale or innovative forms of service provision.</li> </ol> </li> <li>4. Secure green infrastructure in line with its Green Infrastructure Strategy to include provision of new open space and or improvements to existing open spaces, the provision of and/or improvements to links between open space, and measures to link new and existing developments with open space.</li> <li>5. Resist the loss of existing leisure and community facilities (including sport, recreation and cultural) and open spaces, unless it can be demonstrated that:             <ol style="list-style-type: none"> <li>a. the existing use is surplus to requirements, or</li> <li>b. equivalent or better provision in terms of quantity and quality, or some wider community benefits, will be made in a suitable location.</li> </ol> </li> <li>6. Seek provision and maintenance of leisure and community facilities and open spaces from new development.</li> </ol>	<ul style="list-style-type: none"> <li>• Part 1 – GAL will be responsible for funding required for supporting infrastructure, such as the surface access works. Additional financial contributions are to be secured through the <b>Draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> where necessary for the Project, such as the Sustainable Transport Fund. The Project therefore accords with Part 1 of Policy CS12.</li> <li>• Part 2 – the delivery and sequencing of the Project is set out in the <b>Indicative Construction Sequencing</b> <a href="#">[REP2-016]</a>. Timings of certain works are secured through the DCO, such as the national highways works under Requirement 6 of the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</li> <li>• Parts 3 and 4 – the works within RBBC’s jurisdiction include the delivery of the Longbridge Roundabout (Church Meadows) replacement open space. This will deliver new community and leisure</li> </ul>
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		<p>open space along with green infrastructure provisions for the Borough in line with Parts 3 and 4 of Policy CS12.</p> <ul style="list-style-type: none"> <li>• Part 5 – the Project does not result in the loss of existing leisure and community facilities in the District and therefore does not conflict with Part 5 of Policy CS12.</li> <li>• Part 6 – in accordance with Part 6 of Policy CS12, the maintenance and management regimes for the Longbridge Roundabout replacement open space will be set out in the relevant Landscape and Ecology Management Plan (LEMP), in line with the <b>Outline LEMP</b> (Doc Ref. 5.3) as secured under the <b>Draft DCO</b> <a href="#">[REP1-004]</a>.</li> </ul>
<p><b>Policy CS17:</b> Travel options and accessibility</p>	<p>The Council will work with Surrey County Council, the Highways Agency, rail and bus operators, neighbouring local authorities and developers to:</p> <ol style="list-style-type: none"> <li>1. Manage demand and reduce the need to travel, by:</li> </ol>	<p>Policy CS17 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (para 10.35 and pages 142 to 159 and 307) as forming part of the policy context for the Project.</p>

	<ul style="list-style-type: none"> <li>a. Allocating land for development and directing development to accessible locations in the borough</li> <li>b. Securing provision of - or easy access to - services, facilities and public transport as part of new development.</li> </ul> <p>2. Improve the efficiency of the transport network, by:</p> <ul style="list-style-type: none"> <li>a. Enhancing public interchange facilities in Redhill and Horley town centres and promoting Redhill/ Reigate as a transport hub</li> <li>b. Delivering improvements to the road network to meet all street users' needs, enhance accessibility along key corridors and accommodate the forecast increase in journeys.</li> </ul> <p>3. Facilitate sustainable transport choices, by:</p> <ul style="list-style-type: none"> <li>a. Improving travel options through enhanced provision for bus, rail, walking, cycling and bridleways</li> <li>b. Promoting walking and cycling as the preferred travel option for shorter journeys</li> <li>c. Promoting non-car travel</li> <li>d. Requiring the provision of travel plans and transport assessments for proposals which are likely to generate significant amounts of movement</li> <li>e. Seeking to minimise parking provision in the most sustainable locations, and secure</li> </ul>	<p>The Project proposals within RBBC's jurisdiction are related to the Longbridge Roundabout highway improvements and active travel works, as encouraged by Policy CS17. The application is also accompanied by <b>Surface Access Commitments</b> [APP-090] which the Applicant is committed to achieving in relation to surface access at the Airport as part of the Project and its wider package of surface access interventions, beyond RBBC's jurisdiction. The SACs include commitments in relation to bus and coach services, sustainable transport initiatives, on-site active travel measures and measures to discourage single-occupancy private vehicles, in compliance with Policy CS17.</p>
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	adequate parking provision relative to patterns of car ownership elsewhere.	
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<b>Reigate and Banstead Local Plan: Development Management Plan (2019)</b>		
<b>Policy Reference</b>	<b>Policy Description</b>	<b>Compliance Commentary</b>
<b>Economic Development</b>		
Policy EMP1: Principal employment areas	<p>The following areas are designated as Principal Employment Areas:</p> <ul style="list-style-type: none"> <li>• Holmethorpe Industrial Estate, Redhill</li> <li>• Wells Place Industrial Estate, Redhill</li> <li>• Perrywood Business Park, Redhill</li> <li>• Salfords Industrial Estate, Salfords, Redhill</li> </ul> <p>Within the Principal Employment Areas:</p> <ol style="list-style-type: none"> <li>1. Planning permission will be granted for change of use to offices, industrial, and storage and distribution, and for the development of new, upgraded or extended floor space within these uses.</li> <li>2. Development for other uses will only be permitted where the development proposal:</li> </ol>	<p>Policy EMP1 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.40) as forming part of the policy context for the Project.</p> <p>The Project does not propose development with the designated Principal Employment Areas listed in Policy EMP1. As such, Policy EMP1 is not relevant to the Project.</p>



	<ul style="list-style-type: none"> <li>a. would not adversely affect the operation or employment function of surrounding occupiers; and</li> <li>b. is for a use which is either:             <ul style="list-style-type: none"> <li>i. ancillary to, and necessary to support the efficient operation or continued growth of, an existing business; or</li> <li>ii. a small scale facility to serve the unmet needs of local employees; or</li> <li>iii. an alternative employment generating use (excluding all Class A uses) which could not reasonably be located outside a Principal Employment Area.</li> </ul> </li> </ul>	
<p><b>Policy EMP2: Local employment areas</b></p>	<p>The following areas are designated as local employment areas:</p> <ul style="list-style-type: none"> <li>• Pitwood Park Industrial Estate, Tadworth</li> <li>• Kingsfield Business Centre, Redhill</li> <li>• Balcombe Road Industrial area: (Bridge Industrial Estate and Gatwick Metro Centre), Horley</li> </ul> <p>Within the local employment areas, planning permission will be granted for change of use to, or development of new or extended accommodation for the following uses provided the proposal is of an appropriate scale for the area and does</p>	<p>Policy EMP2 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.40) as forming part of the policy context for the Project.</p> <p>The Project does not propose development with the designated local employment areas listed in Policy EMP2. As such, Policy EMP2 is not relevant to the Project.</p>

	<p>not conflict with the amenity or operation of neighbouring land uses:</p> <ul style="list-style-type: none"> <li>a. Industrial and distribution uses</li> <li>b. Offices</li> <li>c. Financial and professional services</li> <li>d. Any other employment-generating uses (excluding all Class A uses other than A2)</li> </ul>	
<p>Policy EMP3: Employment development outside employment areas</p>	<p>Outside of designated employment areas and town centres:</p> <ol style="list-style-type: none"> <li>1. Planning permission will be granted for employment uses (excluding all Class A uses other than A2) provided: <ul style="list-style-type: none"> <li>a. the proposal would not harm the character of the building or surrounding area.</li> <li>b. there would be no harm to the amenity of neighbouring properties/occupants through impacts such as noise, odour, fumes, litter, general disturbance and late night activity.</li> <li>c. the type, scale and intensity of the proposed business activity is appropriate to the locality and the accessibility of the site.</li> <li>d. sufficient on-site, off-street parking is available to cater for both the business use and, where relevant, any remaining residential use.</li> </ul> </li> <li>2. Through the use of conditions, the Council may limit the type and level of activity, including hours of work, of any such employment uses.</li> </ol>	<p>Policy EMP3 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.40) as forming part of the policy context for the Project.</p> <p>The Project does not propose employment use development within RBBC’s jurisdiction. As such, Policy EMP3 is not applicable to the Project.</p>

<p>Policy EMP4: Safeguarding employment land and premises</p>	<p>Development of existing employment land and premises must comply with the following criteria:</p> <ol style="list-style-type: none"> <li>1. The loss of employment land and premises will only be permitted if: <ol style="list-style-type: none"> <li>a. it can be clearly demonstrated that there is no reasonable prospect of (or demand for) the retention or redevelopment of the site for employment use (see Annex 3 for information on what will be required to demonstrate this); or</li> <li>b. the loss of employment floorspace is necessary to enable a demonstrable improvement in the quality and suitability of employment accommodation; or</li> <li>c. the proposal would provide a public benefit which would outweigh the loss of the employment floorspace.</li> </ol> </li> <li>2. Where loss is justified under (1) above, proposals for non-employment uses will only be permitted if they would not adversely affect the efficient operation or economic function of other employment uses or businesses in the locality.</li> </ol>	<p>Policy EMP4 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.40) as forming part of the policy context for the Project.</p> <p>The Project does not relate to the development or loss of existing employment land or premises and therefore Policy EMP4 is not relevant to the Project.</p>
<p>Policy EMP5: Local skills and training opportunities</p>	<p>Requirements for employment and skills training in new development will be secured by means of condition or Section 106 agreements for new residential developments of 25 homes or more and for non-residential development in excess of 1,000sqm size (gross).</p>	<p>Policy EMP5 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 15.40) as forming part of the policy context for the Project.</p>

	<p>The Council will seek to secure a minimum of 20% of the total jobs created by the construction of the new development for local residents or apprenticeships.</p> <p>Opportunities for training and placement schemes targeted at local residents in respect of any jobs created through the end use of any non-residential development will also be explored.</p>	<p>The Project does not propose the development of 25+ homes or 1,000+sqm of non-residential development in RBBC's jurisdiction. As such, Policy EMP5 is not applicable to the Project.</p>
<p><b>Design, character and amenity</b></p>		
<p>Policy DES8: Construction Management</p>	<p>The Council will expect all developments to be managed in a safe and considerate manner, in addition to the following requirements:</p> <ol style="list-style-type: none"> <li>1. Through the use of conditions, the Council may require Construction Management Statements to be agreed and implemented on a case by case basis. These may be required for:             <ol style="list-style-type: none"> <li>a. Minor and major developments creating new homes and/or commercial space.</li> <li>b. Other forms of development, particularly where the site is constrained or where it is identified that there is a specific risk to highway safety and/or the amenity of neighbouring properties.</li> </ol> </li> <li>2. The Construction Management Statement must address how any development impacts will be managed. The statement should be appropriate to the</li> </ol>	<p>Parts 1 and 2 of Policy DES8 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 8.11 and 12.51 and pages 232 to 233) as forming part of the policy context for the Project.</p> <p>The Project is accompanied by a <b>Code of Construction Practice</b> (CoCP) [<a href="#">REP1-021</a>] setting out the management systems and measures to be in place during construction of the Project, with supporting <b>Annexes</b> [APP-083 to APP-087, REP1-023 to REP1-025 and REP2-015] setting out further details including on construction traffic management, arboricultural protection measures and community engagement during construction. The</p>

	<p>scale and context of the development but should include:</p> <ol style="list-style-type: none"> <li>a. Prediction of potential impacts with regard to water, waste, noise and vibration, dust, emissions and odours, ground contamination and soil pollution, wildlife and features and heritage/archaeology. Where potential impacts are identified, mitigation measures should be identified to address these impacts.</li> <li>b. Measures to manage traffic and parking impact, highway/pedestrian safety and congestion.</li> <li>c. Information about phasing and co-ordination of works, including timing of deliveries, particularly where there are multiple developments in a single area.</li> <li>d. Information about measures that will be used to protect any on/off-site features, including trees, verges, drains, kerb stones, and footways, that may be damaged due to works and remediation of any subsequent damage.</li> <li>e. Information about the measures that will be used to protect privacy and the amenity of surrounding sensitive uses; including provision of appropriate boundary protection.</li> <li>f. Means of communication and liaison with neighbouring residents and businesses.</li> <li>g. Hours of work.</li> </ol>	<p>CoCP describes future management plans to be prepared and therefore the CoCP together with the future plans described within it address the requirement of Part 1 of Policy DES8.</p> <p>The CoCP and its Annexes cover the matters listed in Part 2 of Policy DES8 and therefore comply with this part of the policy, including:</p> <ul style="list-style-type: none"> <li>• Measures and procedures to manage environmental effects in Section 5 of the CoCP, including those lists in Part 2(a).</li> <li>• Measures to manage construction traffic and parking by construction workforce in CoCP Annexes 2 and 3 in accordance with Parts 2(b) to (c).</li> <li>• Arboricultural protection measures in CoCP Annex 6.</li> <li>• Procedures to engage and communicate with stakeholders and the public during construction in CoCP Annex 7.</li> </ul>
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	<p>3. Any advertisements and signage proposed to be displayed for the duration of construction works – including as part of site hoardings – must be appropriately designed in accordance with DES10. Conditions will be used to secure removal of any temporary advertisements.</p>	<ul style="list-style-type: none"> <li>Working hours set out in CoCP Section 4.2.</li> </ul> <p>Part 3 is not responded to on the basis it is not listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> as forming part of the policy context for the Project.</p>
<p>Policy DES9: Pollution and contaminated land</p>	<p>The policy applies borough-wide, although particular attention should be paid within the following designated areas:</p> <ul style="list-style-type: none"> <li>Air Quality Management Areas</li> <li>Noise contours associated with Gatwick Airport</li> </ul> <p>1. For all types of development, across the Borough:</p> <p>a. Development will only be permitted where it can be demonstrated that (on its own or cumulatively) it will not result in a significant adverse or unacceptable impact on the natural or built environment (including sensitive habitats); amenity; or health and safety due to fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution. Where there would be potential adverse effects from pollution and adequate mitigation cannot be provided, development will</p>	<p>Policy DES9 is listed in the <b>Joint Surrey Councils Local Impact Report</b> <a href="#">[REP1-097]</a> (paras 3.32, 11.22, 11.23, 12.49 and 16.19 and page 297) as forming part of the policy context for the Project.</p> <p>The Project does not conflict with Parts 1 and 2 of Policy DES9 in that:</p> <ul style="list-style-type: none"> <li><b>ES Chapter 13: Air Quality</b> <a href="#">[APP-038]</a> provides an assessment of potential effects on air quality as a result of the Project. The assessment demonstrates that, subject to mitigation measures as set out in <b>Section 13.9 of ES Chapter 13: Air Quality</b> and in <b>ES Appendix 5.3.2: Code of Construction Practice</b> <a href="#">[REP1-</a></li> </ul>

	<p>not normally be permitted. This includes pollution from construction and pollution predicted to arise during the life of the development. Particular attention should be paid to development within Air Quality Management Areas.</p> <p>b. New development will not normally be permitted where existing fumes, smoke, steam, dust, noise, vibration, smell, light or any other form of air, land, water or soil pollution are unacceptable and there is no reasonable prospect that these can be mitigated against to satisfactory levels. This is particularly relevant for sensitive development such as residential.</p> <p>c. Where a site is known to be contaminated, or where there is a reasonable possibility of contamination, appropriate investigation, and where necessary mitigation and/or remediation will be required.</p> <p>d. Measures to reduce air pollution will be encouraged.</p> <p>2. Within areas of poor air quality (as defined by the presence of Air Quality Management Areas) development must be designed to minimise the occupants' or users' exposure to air pollution, both internally and externally.</p>	<p><a href="#">021</a>], there are not predicted to be any significant air quality effects as a result of the Project.</p> <ul style="list-style-type: none"> <li>• <b>ES Chapter 10: Geology and Ground Conditions</b> <a href="#">[APP-035]</a> sets out the assessment of potential pollution, ground conditions and contamination effects of the Project, supported by a <b>Preliminary Risk Assessment in ES Appendix 10.9.1</b> <a href="#">[APP-138]</a>. Mitigation measures, including a discovery strategy and ground investigations for contamination, are set out in Section 10.8 of ES Chapter 10 to ensure any risks of contamination are suitably addressed.</li> <li>• <b>ES Chapter 14: Noise and Vibration</b> <a href="#">[APP-039]</a> provides an assessment of the Project's potential effects on noise and vibration. An element of the Project's proposed mitigation relates to a noise insulation scheme. Full details of the proposed noise insulation scheme and associated community</li> </ul>
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	<p>3. In areas near Gatwick Airport, residential development will be permitted where it can be demonstrated that the noise levels will not have a significant adverse effect on the proposed development. Proposals for residential development on sites falling within the 57 dB LAeq (07:00 to 23:00) or 48 dB LAeq (23:00 to 07:00) noise contours for Gatwick Airport must:</p> <ol style="list-style-type: none"> <li>a. Be accompanied by a full noise impact assessment.</li> <li>b. Demonstrate that, through satisfactory design, mitigation and/or attenuation measures, future occupants would not be subject to unacceptable noise disturbance both within buildings and externally.</li> </ol>	<p>compensation, including details of consultation, fund sourcing, fund size and duration, eligibility and the means of delivering and securing the Project are set out in <b>Section 8.21 of the Planning Statement [APP-245]</b>. These documents confirm that, subject to embedded and proposed mitigation measures, the Project will result in an acceptable noise and vibration environment.</p> <p>Part 3 of Policy DES9 is not applicable, in that it relates to residential development near the airport which the Project does not propose.</p>
<p><b>Open Space and Recreation</b></p>		
<p>Policy OSR1: Urban Open Space</p>	<p>For designated Urban Open Space:</p> <ol style="list-style-type: none"> <li>1. Proposals which directly complement and enhance the value and use of the Urban Open Space for recreation, biodiversity and/or nature conservation will be looked upon favourably provided that the predominant open character of the space is maintained.</li> </ol>	<p>Policy OSR1 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 16.23 and 17.14) as forming part of the policy context for the Project.</p> <p>Two areas of Urban Open Space (UOS) are located to the north and east of the</p>



	<p>2. Any other development which would result in the full or partial loss of designated Urban Open Space will only be permitted in exceptional circumstances, where any loss of openness resulting from the proposed development would not have an adverse effect on local character, visual amenity or ecological value; and either:</p> <ol style="list-style-type: none"> <li>There is clear evidence to demonstrate that the site is surplus to requirements and does not make a significant contribution to the recreational, community, ecological or amenity value of the area</li> <li>Provision is made for appropriate and suitably located replacement open space of the same type and of at least equivalent quality and/or quantity. Replacement open spaces should be located as close to the lost open space as possible</li> <li>The proposal is for alternative sports and recreational provision which clearly outweighs the loss of the open space; or</li> <li>The proposal is for the expansion of an existing school, the need for which clearly outweighs the loss of the urban open space.</li> </ol> <p>3. Planning conditions and/or obligations will be used to secure the timely delivery of any agreed enhancements or alternative provision.</p>	<p>Project boundary, namely Riverside Garden Park and Church Meadows. These areas are also designated as falling within the Riverside Green Chain and which is considered below against Policy NHE4. The Project would result in the loss of recreational public open space in both UOS designated areas as a result of the Longbridge Roundabout works and active travel measures, namely:</p> <ul style="list-style-type: none"> <li>Approximately 0.13ha of Church Meadow UOS area would be permanently lost along its south-eastern boundary;</li> <li>Approximately 0.02ha of UOS designated land in the north of Riverside Garden Park would be lost; and</li> <li>Approximately 1.01ha* of designated UOS would be lost along the southern boundary of Riverside Garden Park.</li> </ul> <p>*Approximately 0.67ha of this area comprises land currently forming the highway embankment with drainage ditch.</p>
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		<p>This land does not form part of the Riverside Garden Park recreational open space, but is nevertheless covered by the UOS designation The Riverside Garden Park open space, that would be affected, excluding land within the highway boundary, comprises approximately 0.34ha.</p> <p>The potential environmental effects of the proposed NRP surface access improvement works, including the effects on existing open space (including UOS designation) are assessed in the Environmental Statement, in that <b>ES Chapters 8</b> <a href="#">[APP-033]</a> and <b>9</b> <a href="#">[APP-034]</a> consider the landscape and ecological effects respectively, <b>ES Chapter 19</b> <a href="#">[APP-044]</a> considers the recreational effects and the health and wellbeing effects are considered in <b>ES Chapter 18</b> <a href="#">[APP-043]</a>. Replacement open space is proposed as part of the NRP, comprising approximately 1.43ha of land at the existing Car Park B (north and south) and 0.52ha to the north-east of Longbridge Roundabout and west</p>
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		<p>of the River Mole. This is in line with part 2(b) of Policy OSR1, in that:</p> <ul style="list-style-type: none"> <li>• Quantum – the replacement open space proposed by the Project totals 1.95ha and therefore exceeds the UOS land that would be permanently lost, comprising 1.16ha**.</li> <li>• Quality – specific landscaping principles are included within the <b>Outline Landscape and Ecology Management Plan: Part 1</b> (oLEMP) (paragraph 4.7.4) (Doc Ref. 5.3) for the replacement open space provisions, to ensure the replacement space is accessible and usable, and of equal and higher quality to those areas that will be permanently lost by the NRP. Concept designs of the replacement open space areas are also included in Figures 1.2.2 and 1.2.3 of the oLEMP: Part 1, demonstrating how the landscaping principles could be achieved in the design.</li> <li>• Location – the replacement open space is located in close proximity</li> </ul>
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		<p>to the UOS land that will be lost by the Project and would readily function as part of the Riverside Grene Park.</p> <p>**Excluding the highway land within the UOS designation at the Riverside Garden Park, the UOS land to be permanently lost totals 0.49ha in comparison to the 1.95ha of replacement open space which would be delivered by the Project.</p> <p>The delivery of the replacement open space is proposed to be secured in Part 5, paragraph 40 of the <b>draft Development Consent Order [AS-004]</b>. This accords with part 3 of Policy OSR1.</p>
<b>Transport, access and parking</b>		
<p>Policy TAP1: Access, parking and servicing</p>	<ol style="list-style-type: none"> <li>1. All types of development, across the borough, will be required to:             <ol style="list-style-type: none"> <li>a. Provide safe and convenient access for all road users, taking account of cumulative impacts, in a way which would not:</li> </ol> </li> </ol>	<p>Part 1 of Policy TAP1 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 10.36) as forming part of the policy context for the Project.</p> <p>The surface access and active travel measures within RBBC's jurisdiction</p>

	<ul style="list-style-type: none"> <li>i. Unnecessarily impede the free flow of traffic on the public highway, or compromise pedestrians or any other transport mode, including public transport and cycling.</li> <li>ii. Materially exacerbate traffic congestion on the existing highway network.</li> <li>iii. Increase the risk of accidents or endanger the safety of road users including pedestrians, cyclists, and other vulnerable road users.</li> </ul> <p>b. Incorporate a highway design and layout that:</p> <ul style="list-style-type: none"> <li>i. Complies with currently adopted highway standards and guidance (including roads which will not be adopted by the Highways Authority, unless evidence can be provided to clearly demonstrate a scheme would be safe and accessible).</li> <li>ii. Provides adequate access in particular with regard to circulation, maneuvering, turning space, visibility splays and provision for loading/unloading for an appropriate range of vehicles.</li> <li>iii. Allows for access by service vehicles (including refuse vehicles) and emergency vehicles at all times without restriction, including adequate width to ensure there is</li> </ul>	<p>comprise measures to improve the existing highways infrastructure for the benefit of pedestrian, cyclists and to increase the capacity of these road networks. The design of these works has been developed through the alternatives assessment process (detailed in <b>ES Chapter 3</b> [<a href="#">APP-028</a>]). The design has also been informed by the appropriate guidelines, including the Design Manual for Roads and Bridges. These works are compliant with Parts 1(a), 1(b) and 1(e).</p> <p>The Project proposals within RBBC's jurisdiction are not relevant to Parts 1(c), 1(d), 1(f) and 1(g) of Policy TAP1.</p> <p>Parts 2 to 4 are not responded to on the basis they are not listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] as forming part of the policy context for the Project.</p>
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	<p>no obstruction from parked vehicles. On existing road layouts, new development must not materially worsen the existing access for service and emergency vehicles and look to improve it where possible.</p> <ul style="list-style-type: none"> <li>iv. Achieves a permeable highway layout, connecting with the existing highway network safely and includes safe access for pedestrians and cyclists.</li> <li>v. Provides sufficient visibility and lighting for the safe and convenient use of the roads, cycle tracks, paths and parking places.</li> </ul> <p>c. Include car parking and cycle storage for residential and non-residential development in accordance with adopted local standards (see Annex 4) unless satisfactory evidence is provided to demonstrate that non-compliance would not result in unacceptable harm. Such evidence could include on-street parking surveys, evidence of parking demand, and/ or further information on accessibility. Development should not result in unacceptable levels of on-street parking demand in existing or new streets.</p>	
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	<ul style="list-style-type: none"> <li>d. If the development would result in the loss of existing car parking spaces, demonstrate that there is no need for these car parking spaces.</li> <li>e. Incorporate pedestrian and cycle routes within and through the site, linking to the wider sustainable transport network where possible, especially in and to the borough's town centres.</li> <li>f. Provide electric vehicle charging points.</li> <li>g. Remove any dropped kerbs and crossovers made redundant by the development and reinstate the footway/verge.</li> </ul> <p>2. Planning applications will be looked upon favourably unless they would have an unacceptable impact on highway safety or the residual cumulative impacts on the road network would be severe, taking into account proposed mitigation.</p> <p>3. For all developments likely to generate significant amounts of movement, a Transport Assessment or a Transport Statement will be required.</p> <p>4. Provision of the following should be considered and are encouraged in new development:</p> <ul style="list-style-type: none"> <li>a. Shared use of private parking provision for public parking when not in use.</li> <li>b. Initiatives to increase travel by more sustainable options and help reduce the impact and frequency of travel by individual private car</li> </ul>	
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	<p>journeys (such as car pools/car clubs) to and from the development.</p>	
<p>Policy TAP2: Airport car parking</p>	<p>Proposals for additional or replacement airport related parking, including long and short term parking for passenger vehicles, will not be permitted.</p>	<p>Policy TAP2 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 10.41) as forming part of the policy context for the Project.</p> <p>The Project does not propose new or replacement car parking within RBBC's jurisdiction and therefore Policy TAP2 is not relevant to the Project.</p>
<b>Climate change resilience and flooding</b>		
<p>Policy CCF1: Climate change mitigation</p>	<ol style="list-style-type: none"> <li>1. New residential developments must:             <ol style="list-style-type: none"> <li>a. Meet the national water efficiency standard of 110litres/person/day.</li> <li>b. Achieve not less than a 19% improvement in the Dwelling Emission Rate (DER) over the Target Emission Rate (TER) as defined in Part L1A of the 2013 Building Regulations.</li> </ol> </li> <li>2. New non-residential developments of 1,000 square metres or more of gross floorspace should include renewable or low-carbon energy generation to provide 10% of the expected energy usage of the development, unless it can be demonstrated not to be</li> </ol>	<p>Part 2 of Policy CCF1 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 13.31) as forming part of the policy context for the Project.</p> <p>The Project does not entail new non-residential development of 1,000+sqm within RBBC's jurisdiction. As such, Part 2 of Policy CCF1 is not relevant to the Project.</p>



	<p>viable. This could be through renewable energy technologies (i.e. solar photovoltaics), implementation of or connection to a district heating network, or any other method that demonstrably reduces carbon emissions from energy usage.</p> <ol style="list-style-type: none"> <li>3. The Council will support developments that make provision for on-site micro-generation.</li> <li>4. The design of buildings should maximise opportunities for energy saving (e.g. orientation of the building to achieve solar gain), unless this conflicts with other policies.</li> <li>5. The use of sustainable construction methods and materials will be encouraged.</li> </ol>	<p>Parts 1, 3, 4 and 5 are not responded to on the basis they are not listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> as forming part of the policy context for the Project.</p>
<p><b>Polic CCF2: Flood risk</b></p>	<ol style="list-style-type: none"> <li>1. Development proposals must avoid areas at risk of flooding where possible and prioritise development in areas with the lowest risk of flooding. The Sequential Test shall be undertaken for developments in Flood Zones 2 and 3 except where exempt in accordance with the requirements of the NPPF and Planning Practice Guidance. Development will not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. Where necessary the Exception Test must also be satisfied in line with national guidance.</li> <li>2. Sites within Flood Zones 2 and 3, sites within Flood Zone 1 which are greater than 1 hectare in area, and</li> </ol>	<p>Part 2 of Policy CCF2 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (para 9.19) as forming part of the policy context for the Project.</p> <p>A Flood Risk Assessment (FRA) has been submitted and is contained <b>ES Appendix 11.9.6 [APP-147 to APP-149]</b> in accordance with Part 2 of Policy CCF2 and has carried out sequential and exception tests as required by National policy. The FRA provides an assessment of flood risk for the Project, assesses the potential flood effects on external</p>

	<p>sites with critical drainage problems or where a proposed development will result in a vulnerable development being subject to other sources of flooding, will be required to carry out a site-specific Flood Risk Assessment (appropriate to the scale of the development). Where a Flood Risk Assessment is required, it should:</p> <ol style="list-style-type: none"> <li>a. take account of the impacts of climate change over the lifetime of the development</li> <li>b. demonstrate that the development will be safe for its lifetime taking account of the vulnerability of the proposed use; and</li> <li>c. take account of the advice and recommendations set out in the Council's Strategic Flood Risk Assessment.</li> </ol> <p>3. Proposals must not increase the existing and future risk of flooding elsewhere. Where possible, proposals should seek to secure opportunities to reduce both the cause and impact of flooding for existing and proposed development.</p> <p>4. Development should reduce surface water run-off rates using Sustainable Drainage systems where necessary, suitable to the scale and type of development. Where Sustainable Drainage Systems are proposed, schemes should include appropriate arrangements for the ongoing maintenance for the lifetime of the development.</p>	<p>receptors due to the Project and describes the Project's flood mitigation strategy to mitigate these risks. The FRA demonstrates that it has taken account of climate change impacts, the lifetime of the development and had regard to recommendations of Strategic Flood Risk Assessments as relevant to the Project. The FRA has therefore been prepared in compliance with Part 2 of Policy CCF2.</p> <p>Parts 1, 3 and 4 are not responded to on the basis they are not listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> as forming part of the policy context for the Project.</p>
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**Protecting the natural and historic environment**
**Policy NHE1:  
Landscape  
protection**

1. With regard to the Surrey Hills Area of Outstanding Natural Beauty (AONB):
  - a. Great weight will be attached to the impact that development proposals would have on the landscape and scenic beauty of the AONB;
  - b. Proposals for major development within the AONB will only be supported in exceptional circumstances where it is demonstrated as being in the public interest, in accordance with national policy.
  - c. Proposals must conserve and enhance the landscape and scenic beauty of the AONB and development proposals outside its boundaries must have regard to protecting its setting.
  - d. Proposals should have regard to the current Surrey Hills AONB Management Plan.
2. The principles set out in Policy NHE1(1) above apply in the Area of Great Landscape Value (AGLV), as designated on the Policies Map, until such a time as the Surrey Hills AONB Boundary Review is completed which may extend the AONB into land currently designated AGLV. Any AGLV remaining after the AONB Boundary Review will thereafter be treated as a local landscape designation.

Policy NHE1 is listed in the **Joint Surrey Councils Local Impact Report** [[REP1-097](#)] (para 6.30 and pages 62 to 64) as forming part of the policy context for the Project.

Commentary against the Project's assessment of Surrey Hills AONB is set out against Policy CS2. This commentary demonstrates that the Project does not conflict with Part 1 of Policy NHE1.

In respect of Part 2 of Policy NHE1, Natural England began work on the Surrey Hills Boundary Review following a written Ministerial Statement on 24th June 2021. As part of the consultation process the Surrey Hills National Landscape team has mapped areas where it is considered there is strong evidence for further extensions to the identified candidate areas. As yet there has been no change to the boundary of the National Landscape. Notwithstanding this, **ES Figures 8.6.3 to 8.6.7** [REP2-006 to REP2-008] illustrate the baseline and

	<p>3. Development proposals located between Horley and Gatwick Airport must ensure that a physical visual break is retained through the protection and intensification of existing tree/ hedgerow belts and other landscape measures including introducing a suitable and distinct landscape buffer to reinforce the identity and separateness of the settlement of Horley from Crawley and Gatwick Airport. Development proposals must also have regard to the open setting of Gatwick Airport consistent with adopted planning policies in adjoining areas. This is reflected on the policies map with the designation of Gatwick Open Setting.</p> <p>4. Throughout the borough, development proposals must:</p> <ul style="list-style-type: none"> <li>a. Respect the landscape character and landscape features of the locality.</li> <li>b. Have particular regard to potential impacts on ridgelines, public views and tranquillity, and the effects of light pollution.</li> <li>c. Be of a design, siting and scale that is complementary to the landscape and its surroundings.</li> <li>d. Use appropriate external building materials, particularly in terms of type and colour, to avoid the development appearing conspicuous in the landscape.</li> </ul>	<p>proposed increase in the numbers of overflights that have informed the assessment of the perception of tranquility within a wider study area, that would include any boundary change.</p> <p>In respect of Part 3 of Policy NHE1, the majority of the designated Gatwick Open Setting (GOS) area is located outside the DCO boundary and not impacted by the Project proposals. Limited works are proposed by the Project within the GOS designation, relating to highway improvement works to the existing highway. As these works are related to the existing highway, they are not considered to impede the objectives of the GOS in ensuring a physical visual break is provided between Horley and Gatwick Airport.</p> <p><b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> <a href="#">[APP-033]</a> provides an assessment of the landscape, townscape and visual effects resulting from the NRP. This includes an assessment of effects on the existing</p>
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	<ul style="list-style-type: none"> <li>e. Demonstrate how opportunities have been taken to enhance the immediate and wider setting of the development.</li> <li>f. Seek to protect the best and most versatile agricultural land.</li> </ul> <p>5. Minor development that would assist in the continuation or establishment of rural businesses or benefit the social and economic wellbeing of rural communities will be supported providing it does not conflict with the aims of conserving and enhancing the natural beauty of the landscape.</p> <p>6. Proposals for renewable energy developments, in particular wind turbines and solar farms, will only be permitted where their impact (visual and noise) would not harm the landscape or undermine the intrinsic character and beauty of the countryside.</p>	<p>character areas, in that the GOS designation is located in the Low Weald and Horley Townscape character areas. Highway planting would be removed along the southern boundary of the Riverside Garden Park and to the north of the A23 Airport Way to facilitate the proposed highway improvements. New replacement woodland and scrub planting is proposed on the edge of Riverside Garden Park to integrate the road corridor with the park, along with new highway planting along the A23 Airport Way corridor.</p> <p>The landscaping proposals along the A23 London Road / A23 Airport Way / M23 Spur are shown on Figures 1.2.4 to 1.2.15 of the <b>oLEMP: Part 1</b> <a href="#">[APP-113]</a>. Landscape and ecology objectives are contained within the oLEMP: Part 1 for the surface access corridor, ensuring that new planting provides visual screening and a transition to the countryside.</p> <p>Under Requirement 8 of the <b>draft DCO</b> <a href="#">[REP1-004]</a>, the development must be carried out in accordance with the relevant Landscape and Ecology Management</p>
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		<p>Plan, to be prepared in general accordance with the oLEMP and including its design objectives.</p> <p>The works are open in nature and, at the completion of the works and through the implementation of new and replacement planting, a physical visual break will continue to exist between Horley and Gatwick Airport in line with Part 3 of Policy NHE1.</p> <p>As such, the Project does not conflict with Part 3 of Policy NHE1.</p> <p>With regards to Part 4 of Policy NHE1, an assessment of the character of the site and its surroundings, contained in <b>ES Chapter 8: Landscape, Townscape and Visual Resources</b> [<a href="#">APP-033</a>], informed the design development of the Project and mitigation measures, taking account of designated sites and existing green infrastructure. <b>ES Chapter 8</b> sets out the embedded or mitigation measures proposed as part of the Project, and which has informed the landscaping principles</p>
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		<p>and concept designs contained in <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan</b> (Doc Ref. 5.3). On this basis, the Project has been developed in line with Part 4 of Policy NHE1.</p> <p>Parts 5 and 6 of Policy NHE1 are not applicable to the Project proposals within RBBC’s jurisdiction.</p>
<p><b>Policy NHE2:</b> Protecting and enhancing biodiversity and areas of geological importance</p>	<p>The following spatial designations are relevant:</p> <ul style="list-style-type: none"> <li>• Natura 2000 sites (including the Mole Gap to Reigate Escarpment SAC)</li> <li>• Sites of Special Scientific Interest (SSSIs)</li> <li>• Sites of Nature Conservation Importance (SNCIs)</li> <li>• Potential Sites of Nature Conservation Importance (PoSNCIs)</li> <li>• Regionally Important Geological Sites (RIGSs)</li> <li>• Local Nature Reserves (LNRs)</li> <li>• Biodiversity Opportunity Areas (BOAs)</li> </ul> <p>1. Internationally designated sites, (Natura 2000 sites), including the Mole Gap to Reigate Escarpment SAC, will be afforded the highest level of protection. Development proposals which are likely to have a significant effect on these sites, either individually or</p>	<p>Policy NHE2 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 7.29 and 8.11) as forming part of the policy context for the Project.</p> <p>Commentary on the Project’s assessment of statutory and non-statutory designated sites within the assessment’s search area is contained against Policy CS2. As set out against Policy CS2, the assessment in <b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] identifies that due to the distance of international, national and local statutory designated sites and the Project’s mitigation measures, it is assessed that there would be no impact from construction or long-</p>

	<p>in combination with other development, must be accompanied by an Appropriate Assessment, and will only be permitted where it is demonstrated that:</p> <ul style="list-style-type: none"> <li>a. proposed development will not have an adverse effect on the integrity of the site, or</li> <li>b. where adverse effects are predicted, it is demonstrated that: <ul style="list-style-type: none"> <li>i. there are imperative reasons of overriding public interest for permitting the development</li> <li>ii. there are no satisfactory alternative sites or solutions; and</li> <li>iii. any impacts will be suitably mitigated.</li> </ul> </li> <li>c. New major development on sites that may support commuting and foraging habitat (including mature vegetative linear features such as woodlands, hedgerows) within 3.5km of Mole Gap to Reigate Escarpment, should have due regard to the possibility that Bechstein's Bat will be utilising the site. Such proposals will be required to incorporate relevant surveys and ensure that key features (foraging habitat and commuting routes) are retained or appropriately mitigated, in addition to a suitable buffer to safeguard against disturbance.</li> <li>d. Proposals for improved countryside access which would divert recreational pressure away</li> </ul>	<p>term operation. Similarly, no impacts are anticipated to arise from the Project's construction on non-statutory designated sites within RBBC's jurisdiction (e.g. The Roughs SNCI), owing to the proposed mitigation measures, and there would be no new or continuing operational effects. The assessment has been carried out in accordance with Part 1 of Policy NHE2 and as a result of its assessment findings, Parts 2, 3 and 4 of Policy NHE2 are not engaged.</p> <p>In line with Parts 5 and 6 of Policy NHE2, <b>ES Appendix 8.8.1 Outline Landscape and Ecology Management Plan (LEMP)</b> (Doc Ref. 5.3) sets the overarching vision for the Project along the project-wide design principles (Doc Ref. 7.3) to require detailed design to retain habitats of ecological where possible, in order to minimise habitat loss. The obligations within the Outline LEMP are secured through Requirement 8 of the <b>Draft DCO [REP1-004]</b>. A LEMP for individual parts of the Project and detailed tree protection and landscape planting proposals will be</p>
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	<p>from the Mole Gap to Reigate Escarpment SAC, particularly those parts which are subject to overuse, will be supported, subject to the wider protection of biodiversity interest features.</p> <ol style="list-style-type: none"> <li>2. Development likely to have an adverse effect on the special interest features of a SSSI will only be permitted where it is demonstrated that the benefits of the development in that location clearly outweigh the impacts on the special interest feature and on the national network of SSSI, and any impacts will be suitably mitigated.</li> <li>3. Development likely to have an adverse effect upon any site designated as a SNCI, RIGS or a LNR will only be granted where:             <ol style="list-style-type: none"> <li>a. the need for, and benefits of, the development on that site clearly outweigh the impacts on nature and geological conservation features and community value; and</li> <li>b. it is demonstrated that adequate mitigation of, or as a last resort, compensation for, the impact of the development will be put in place.</li> </ol> </li> <li>4. Development within or affecting PoSNClS will require an assessment to identify the ecological and nature conservation value of the site and the environmental impact of the proposed development, prepared by a specialist consultant or other competent body. If this assessment identifies that the site contains features</li> </ol>	<p>submitted to and approved by the LPA before work commences. These LEMPs will be substantially in accordance with the outline LEMP and BNG Statement.</p> <p>The Project has been designed to achieve Biodiversity Net Gain (BNG). The BNG proposals are set out within <b>ES Appendix 9.9.2: Biodiversity Net Gain Statement</b> (Doc Ref. 5.3) and demonstrate that a substantial BNG of over 20% will be achieved.</p> <p>The Project is therefore compliant with Parts 5 and 6 of Policy NHE2.</p>
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	<p>that align with the Surrey SNCI selection criteria then the conditions of clause 3 above must be met.</p> <p>5. Throughout the borough, and especially within BOAs, development proposals will be expected to:</p> <ol style="list-style-type: none"> <li>a. retain and enhance other valued priority habitats and features of biodiversity importance; and</li> <li>b. be designed, wherever possible, to achieve a net gain in biodiversity. Where a development will impact on a priority habitat or species, or protected species, and mitigation cannot be provided on site in an effective manner, developers may be required to offset the loss by contributing to appropriate biodiversity projects elsewhere, in a location agreed with the Council.</li> </ol> <p>6. Development opportunities where the primary objective is to conserve or enhance biodiversity will be considered favourably.</p>	
<p><b>Policy NHE3: Protecting trees, woodland areas and natural habitats</b></p>	<p>The policy applies across the borough; although, the following features and spatial designations are particularly relevant:</p> <ul style="list-style-type: none"> <li>• Ancient woodland areas</li> <li>• Trees, either individually or in groups/areas, protected by Preservation Orders</li> <li>• Conservation Areas</li> </ul>	<p>Policy NHE3 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 6.31 and 7.30 and page 78) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 9: Ecology and Nature Conservation</b> [<a href="#">APP-034</a>] provides an</p>

	<ul style="list-style-type: none"> <li>• Mole Gap to Reigate Escarpment SAC Core Sustenance Zone of Bechstein’s Bat (<i>Myotis bechsteinii</i>)</li> </ul> <ol style="list-style-type: none"> <li>1. Where relevant, new development proposals will be required to include an assessment of existing trees and landscape features on site, including their suitability for retention. This assessment should also include consideration of the impact on habitats beyond the site boundary.</li> <li>2. Development resulting in the loss of or the deterioration in the quality of a protected tree or hedgerow (including trees covered by protection orders, protected hedgerows, trees in Conservation Areas, Ancient Woodlands, aged and veteran trees outside Ancient Woodland and trees classified as being of categories A or B in value), will be refused unless the need for, and benefits of, development in that location clearly outweigh the loss. This will be assessed on a case by case basis commensurate with the value of the feature.</li> <li>3. Unprotected but important trees, woodland or hedgerows with ecological, amenity or other value should be retained as an integral part of the design of development except where their long-term survival would be compromised by their age or physical</li> </ol>	<p>assessment of the Project’s effects on existing trees and their habitats, ancient or veteran trees and any designated ancient woodland areas in accordance with Part 1 of Policy NHE3.</p> <p>The application is accompanied by <b>ES Appendix 8.10.1: Tree Survey Report and Arboricultural Impact Assessment</b> (Doc Ref. 5.3) which identifies the presence of ancient woodland, veteran trees and trees within Conservation Areas in the Project boundary.</p> <p>As set out in <b>ES Chapter 9</b>, opportunities to avoid effects on existing trees and hedgerows (including their features and habitats) have been taken during the site selection process and mitigation measures have been designed into the Project to avoid effects on ancient woodland. As such, the Project will not result in the loss or deterioration of irreplaceable habitats including ancient woodland or the loss of aged/veteran trees outside the ancient woodland. These measures are reported in Section 9.8 of <b>ES Chapter 9</b>. The</p>
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	<p>condition or there are overriding benefits of their removal.</p> <p>4. Where loss of features described in 2 and 3 above are permitted, this will be subject to adequate compensatory provision commensurate to that which is lost. This should be provided on site where possible, but off site provision will also be considered in exceptional circumstances.</p> <p>5. Where replacement tree and hedge planting is required, appropriate species of trees should be used and sufficient space must be provided at the design stage for tree provision, including space to allow trees to reach their optimum size.</p> <p>6. A buffer zone will be required between ancient woodland sites and the boundary of adjacent new developments. Back gardens will not be considered part of these buffer zones.</p>	<p>Project therefore does not conflict with Part 2 of Policy NHE3.</p> <p>The detailed design under Requirement 4 of the <b>Draft DCO</b> [<a href="#">REP1-004</a>] is required to be in accordance with the <b>Design Principles</b> (Doc Ref. 7.3). Project-Wide Design Principle L1 requires any trees, shrub, habitats and hedgerows which are features of ecological value to be retained and incorporated into the design where feasible to do so against design requirements. The Project therefore complies with Part 3 of Policy NHE4.</p> <p>The application is supported by <b>ES Appendix 8.8.1: Outline Landscape and Ecology Management Plan (oLEMP)</b> (Doc Ref. 5.3) which sets out the overarching vision for the new and replacement on-site landscape proposals and management of green infrastructure in the Project in line with Part 4 of Policy NHE3. The oLEMP informs the detailed Landscape and Ecology Management Plans to be prepared in line with the <b>Draft DCO</b> [<a href="#">REP1-004</a>], which will detail planting</p>
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		<p>species and their location in line with Part 5 of Policy NHE3. Any required buffer zones to Ancient Woodland areas will be designed through the detailed design stage and the production of the detailed LEMP(s) in line with Part 6 of Policy NHE3.</p>
<p><b>Policy NHE4: Green and blue infrastructure</b></p>	<ol style="list-style-type: none"> <li>1. The Council will work with landowners, land managers and stakeholders to secure the provision of a multi-functional green and blue infrastructure network by: <ol style="list-style-type: none"> <li>a. Resisting the loss of existing public open space. Where this is urban open space the criteria within OSR1(2) must be met to justify the loss.</li> <li>b. Ensuring best management practice of multi-functional green/blue spaces across the Borough.</li> <li>c. Preserving and enhancing existing green infrastructure and water features in priority regeneration areas and throughout existing urban areas.</li> <li>d. Looking favourably on proposals that enhance, extend, or make new provision for allotments or community food growing opportunities.</li> </ol> </li> <li>2. Development proposals must:</li> </ol>	<p>Policy NHE4 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 7.30 and 17.13 and page 80) as forming part of the policy context for the Project.</p> <p>Part 1 relates to work to be undertaken by the Council. Part 1(a) relates to existing urban open space designated under Policy OSR1, and commentary against this policy is provided above.</p> <p>In respect of Part 2 of Policy NHE4, commentary on the Project’s relationship to the nature environment and green infrastructure is provided against Policy CS2.</p>

	<ul style="list-style-type: none"> <li>a. Where possible, increase access to and provision of green and blue infrastructure and open spaces.</li> <li>b. Avoid any adverse impacts on existing habitats and take the opportunity to enhance and incorporate biodiversity as an integral part of design, including watercourses and riverside habitats.</li> <li>c. Positively incorporate green and blue infrastructure as an integral part of the design of new developments; supporting initiatives within the Council’s Green Infrastructure Strategy and Action Plan where possible. Any new green and blue infrastructure should link with existing green/blue infrastructure in the surrounding area where possible.</li> <li>d. Incorporate open spaces and green spaces which can be used in a variety of ways and support a range of activities.</li> <li>e. Protect and enhance public rights of way and National Trails.</li> <li>f. Where possible, create new links and corridors between open spaces, green/blue infrastructure and the countryside beyond, such as through the provision of footpaths and bicycle paths or through planting and landscaping.</li> </ul>	<p>With regards to Part 3 of Policy NHE4, two designated areas within the Riverside Green Chain (RGC) are located to the north and east of the Project boundary, namely Riverside Garden Park and Church Meadows. These areas are also designated as Urban Open Space and impacts on that designation are considered above against Policy OSR1. The Project proposes works within the designated RGC area relating to the Longbridge Roundabout replacement open space, highway works and active travel measures. The quantum of designated RGC area within the Project boundary is set out above against Policy OSR1. The works include replacement open space active travel measures for the benefit of pedestrians and cyclists, which would aid connections to the River Mole. The works are therefore considered to be compliant with a range of uses under Part 3 of Policy NHE4, including parts 3(a), (b), (e) and (h).</p>
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	<p>g. Identify measures for appropriate maintenance of relevant green/blue infrastructure.</p> <p>3. Within land designated as a Riverside Green Chain, the following uses and facilities will be permitted to facilitate activities compatible with the area and the maintenance of a natural green and blue environment:</p> <p>a. Informal recreation.</p> <p>b. Formal outdoor recreation, allotments, agriculture and woodland where feasible.</p> <p>c. Establishment of Local Nature Reserves and similar nature conservation provision.</p> <p>d. Enhancements to the riverine environment for water related purposes, including the establishment of buffer zones.</p> <p>e. Safe access provisions to appropriate sections of the riverine environment including safety measures consistent with the scale of visitor and operation activity while protecting other areas as wildlife refuges in accordance with a nature conservation strategy for the area.</p> <p>f. Interpretation and supervised investigation of archaeological sites.</p> <p>g. Creation of ponds, swales, bunds, stormwater wetlands and similar features as part of the surface water drainage system serving major</p>	
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	<p>new housing development and consistent with an overall agreed landscape plan.</p> <ul style="list-style-type: none"> <li>h. Construction of a combined orbital cycle and pedestrian path with connections to new and existing housing areas consistent with nature conservation values.</li> <li>i. Provision of facilities for horse riders, where practicable.</li> </ul>	
<p><b>Policy NHE7: Rural Surrounds of Horley</b></p>	<p>Proposals for development within the Rural Surrounds of Horley should protect the countryside in accordance with national policy which recognises the intrinsic character and beauty of the countryside.</p> <ul style="list-style-type: none"> <li>1. Proposals for development within the Rural Surrounds of Horley will be looked on favourably where they: <ul style="list-style-type: none"> <li>a. support the essential needs of agriculture, forestry and outdoor sports with development that is an appropriate size, siting and design and materials; or</li> <li>b. support the social and economic wellbeing of rural communities, including small scale rural businesses.</li> </ul> </li> <li>2. The creation of new dwellings will be permitted where: <ul style="list-style-type: none"> <li>a. the proposal meets the requirements of Criteria 1 above;</li> </ul> </li> </ul>	<p>Part 1(a) of Policy NHE7 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (para 17.13) as forming part of the policy context for the Project.</p> <p>In respect of Part 1(a) of Policy NHE7, the Project proposals falling within the designated Rural Surrounds of Horley relate to the proposed highway improvements along the M23 corridor. The proposals do not meet the requirements under part 1 of Policy NHE7 to be looked upon favourably by RBBC. However, this does not result in a conflict with Policy NHE7 but rather means that the proposals falling within the Rural Surrounds of Horley designation are not given favourable regard. The works within the designated</p>



	<ul style="list-style-type: none"> <li>b. the proposal seeks the replacement of an existing single dwelling with one of an equivalent landscape impact;</li> <li>c. the requirement for a countryside or rural location of the proposal can be otherwise justified;</li> <li>d. the proposal will enhance or maintain the characteristics of the immediate rural setting;</li> <li>e. the scale of the proposal is proportionate to its countryside setting; and</li> <li>f. the proposal will enhance or maintain the visual and physical distinction between Horley urban area and its rural surroundings.</li> </ul> <p>3. Extensions and replacement of existing buildings and any other ancillary development must maintain and not compromise the character of the countryside and landscape.</p> <p>4. Proposals that promote innovative and outstanding architectural design will be considered favourably.</p>	<p>area are limited to improvements to the existing highway and are therefore not considered to impede the objectives of the designation to protect the wider countryside.</p> <p>Parts 1(b), 2, 3 and 4 are not responded to on the basis they are not listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> as forming part of the policy context for the Project.</p>
<p><b>Policy NHE9: Heritage assets</b></p>	<ul style="list-style-type: none"> <li>1. Development will be required to protect, preserve, and wherever possible enhance, the Borough’s designated and non-designated heritage assets and historic environment including special features, area character or settings of statutory and locally listed buildings.</li> <li>2. All planning applications that directly or indirectly affect designated or non-designated heritage assets</li> </ul>	<p>Policy NHE9 is listed in the <b>Joint Surrey Councils Local Impact Report [REP1-097]</b> (paras 5.22 to 5.25 and 5.36 and page 40) as forming part of the policy context for the Project.</p> <p><b>ES Chapter 7: Historic Environment [APP-032]</b> provides an assessment of the</p>

	<p>must be supported by a clear understanding of the significance, character and setting of the heritage asset, and demonstrate:</p> <ol style="list-style-type: none"> <li>a. how this understanding has informed the proposed development</li> <li>b. how the proposal would affect the asset's significance; and</li> <li>c. any necessary justification proportionate to the importance of the heritage asset and the potential effect of the proposal.</li> </ol> <p>3. In considering planning applications that directly or indirectly affect designated heritage assets, the Council will give great weight to the conservation of the asset, irrespective of the level of harm. Any proposal which would result in harm to or total loss of a designated heritage asset or its setting will not be supported unless a clear and convincing justification is provided. In this regard:</p> <ol style="list-style-type: none"> <li>a. Substantial harm to, or loss of, Grade II assets will be treated as exceptional and substantial harm to, or loss of, Grade I and II* assets and scheduled monuments will be treated as wholly exceptional.</li> <li>b. Where substantial harm to, or loss of designated heritage assets would occur as a result of a development proposal, planning permission will be refused unless there are</li> </ol>	<p>Project's potential effects on the historic environment, including designated and non-designated heritage assets (including Registered Historic Parks and Gardens). The assessment in <b>ES Chapter 7</b> satisfies Parts 1 to 8 and 11 of Policy NHE9. The Church Road (Horley) Conservation Area is located to the north of the NRP site boundary, with a small part of the Conservation Area falling within the Project site boundary.</p> <p>The works within the Conservation Area relate to the Longbridge Roundabout surface access improvements works. Adjacent to the Conservation Area, the land is proposed to be used for a contractor compound on a temporary basis and then replacement open space. Section 7.9 of <b>ES Chapter 7: Historic Environment</b> [<a href="#">APP-032</a>] provides an assessment of the impacts and effects resulting from the Project on the Church Road Conservation Area, in line with Parts 9 and 10 of Policy NHE9.</p>
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	<p>substantial public benefits which would outweigh the harm or loss; or</p> <ul style="list-style-type: none"> <li>i. it can be robustly proven that there are no other reasonable and viable uses for the asset in the short or medium term nor any other realistic prospect of conservation; and</li> <li>ii. the harm or loss would be outweighed by the benefits of redevelopment.</li> </ul> <p>c. Where less than substantial harm to a designated heritage asset would occur as a result of a development proposed, the harm will be weighed against the public benefits of the proposal.</p> <p>4. Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments will be subjected to the tests in (3) above.</p> <p>5. In considering proposals that directly or indirectly affect other non-designated heritage assets, the Council will give weight to the conservation of the asset and will take a balanced judgement having regard to the extent of harm or loss and the significance of the asset.</p> <p>6. All development proposals must be sympathetic to a heritage asset and/or its setting by ensuring the use</p>	<p><b>ES Chapter 7</b> and its supporting appendices also provides an archaeological assessment of the Project site. Notably, <b>ES Appendix 7.6.1: Historic Environment Baseline Report [APP-101]</b> provides detailed summaries of the results of the archaeological work, based on the approach agreed in advance with the archaeological advisors to the Local Authorities. It is proposed that further investigation may be undertaken ahead of commencement of the development activities that would be carried out in accordance with the two Written Schemes of Investigation, namely <b>ES Appendix 7.8.1: Written Scheme of Investigation for post-consent archaeological investigations – Surrey [APP-105]</b> and <b>ES Appendix 7.8.2: Written Scheme of Investigation for post-consent archaeological investigations and historic building recording – West Sussex [APP-106]</b>. This satisfies the requirements of Parts 12 and 13 of Policy NHE9.</p>
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	<p>of appropriate high quality materials, design and detailing (form, scale, layout and massing).</p> <p>7. Development that would help secure the long term viable use and sustainable future for heritage assets, especially those identified as being at risk of loss and decay, in a manner consistent with its conservation will be supported. Any associated or enabling development should have an acceptable relationship to the heritage asset, and character of the surrounding area.</p> <p>8. Proposals which retain, or if possible, enhance the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features in a manner consistent with its conservation, will be supported.</p> <p>9. Proposals affecting a Conservation Area must preserve, and where possible, enhance the Conservation Area, paying particular regard to those elements that make a positive contribution to the character of the Conservation Area and its setting, and the special architectural or historic interest of the area.</p> <p>10. Demolition (full or partial) of a building or removal of trees, structures or other landscape features in a Conservation Area will be permitted only where:</p> <ol style="list-style-type: none"> <li>a. a replacement development has been approved; and</li> </ol>	
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	<ul style="list-style-type: none"> <li>b. the loss of the existing building, structure, tree or landscape feature will not detract, or where appropriate enhances, the character or appearance of the Conservation Area. Assessment of the contribution of an existing building must have regard to its character, design and construction, but not its condition.</li> </ul> <p>11. Development within or affecting the setting of a historic park or garden will be required to:</p> <ul style="list-style-type: none"> <li>a. Avoid subdivision.</li> <li>b. Retain or restore features of historic or architectural interest, including trees, other distinctive planting and hard landscaping, and garden features.</li> <li>c. Where relevant, be accompanied by an appropriate management plan.</li> </ul> <p>12. An archaeological assessment including where appropriate a field evaluation, will be required to inform the determination of planning applications for:</p> <ul style="list-style-type: none"> <li>a. Sites which affect, or have the potential to affect, Scheduled Monuments.</li> <li>b. Sites which affect, or have the potential to affect, areas of Archaeological Importance or High Archaeological Potential.</li> <li>c. All other development sites exceeding 0.4ha.</li> </ul> <p>13. Where the policies map, or other research, indicates that remains of archaeological significance are likely</p>	
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	<p>to be encountered on a site, the Council will require schemes for the proper investigation of the site to be submitted and agreed. These must incorporate the recording of any evidence, archiving of recovered material and publication of the results of the archaeological work as appropriate, in line with accepted national professional standards.</p>	
<b>Area 3: The Low Weald</b>		
<p><b>Policy HOR9: Horley Strategic Business Park</b></p>	<p>Site area: 31ha  Existing/previous use: Fields  Source: HELAA Ref: HC11, HC12, HC28, and HC33  Development timeframes: See below  Allocation: The site is allocated for:</p> <ul style="list-style-type: none"> <li>• A strategic business park of predominantly offices</li> <li>• A complementary range of commercial, retail and leisure facilities to serve and facilitate the main business use of the site</li> <li>• At least 5 ha of new high quality public open space, including parkland and outdoor sports facilities</li> </ul> <p><i>[Additional requirements for the development set out in Policy HOR9 relating to movement and accessibility; drainage; design; uses; and delivery.]</i></p>	<p>Policy HOR9 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 3.33 and 15.40 to 15.42 and page 286) as forming part of the policy context for the Project.</p> <p>Land allocated for the Horley Strategic Business Park is located to the north-east of the existing Gatwick Airport and to the north of the A23 Airport Way and Airport Way roundabout.</p> <p>Limited Project works are proposed within the allocated land, relating to highway improvement works. The NRP highway works bring a net benefit to the strategic network.</p>

		<p>As made clear in the DCO Application, for instance in <b>ES Chapter 12: Traffic and Transport</b> [<a href="#">AS-076</a>], the South Terminal Roundabout proposals do not preclude the opportunity for access to be proposed for the Business Park, should the development come forward and should it be necessary for that development.</p>
<b>Infrastructure to support growth</b>		
<b>Policy INF1: Infrastructure</b>	<ol style="list-style-type: none"> <li>1. The Council will require timely provision of infrastructure to support a particular development and/or to mitigate any negative impacts that would otherwise result from the development.</li> <li>2. Where infrastructure critical to support a development cannot be provided when the Council considers it is needed, development will be required to be phased to reflect infrastructure delivery.</li> <li>3. Infrastructure may be secured by planning conditions and obligations, and highway agreements, and may be funded by obligations and agreements for site-specific infrastructure, and from the Community Infrastructure Levy for infrastructure needed because of the cumulative impact of developments.</li> <li>4. Applications which the Council considers likely to impact on the local utilities network must provide evidence to demonstrate that the impact would not be</li> </ol>	<p>Policy INF1 is listed in the <b>Joint Surrey Councils Local Impact Report</b> [<a href="#">REP1-097</a>] (paras 3.32, 9.20 and 15.43 and pages 96, 287 and 297) as forming part of the policy context for the Project.</p> <p>The delivery and sequencing of the Project, including its accompanying infrastructure provisions, is set out in the <b>Indicative Construction Sequencing</b> [<a href="#">REP2-016</a>]. Timings of certain works are secured through the DCO, such as the national highways works under Requirement 6 of the <b>Draft DCO</b> [<a href="#">REP1-004</a>]. As set out against Policy CS12, GAL will be responsible for funding required for</p>

	<p>unacceptable, including with regard to gas and electricity supply and distribution, broadband infrastructure, water supply pressure, waste-water treatment capacity, and the risk of sewer flooding.</p> <p>5. The key infrastructure on which the delivery of the Plan depends is set out in the Infrastructure Schedule at Annex 6. Planning applications and infrastructure providers should have regard to this Schedule, or any updates in the latest Infrastructure Delivery Plan.</p>	<p>supporting infrastructure, such as the surface access works. Additional financial contributions are to be secured through the <b>Draft Section 106 Agreement</b> <a href="#">[REP2-004]</a> where necessary for the Project, such as the Sustainable Transport Fund.</p> <p>The Project therefore accords with Policy INF1.</p>
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## 2 References

Reigate and Banstead Borough Council (2014) Reigate and Banstead Local Plan: Core Strategy. Adopted July 2014 and reviewed 2019.

Reigate and Banstead Borough Council (2019) Reigate and Banstead Local Plan: Development Management Plan. Adopted September 2019.

## 3 Glossary

Term	Description
AONB	Area of Outstanding Natural Beauty
CoCP	Code of Construction Practice
DCO	Development Consent Order
GOS	Gatwick Open Setting
NRP	Northern Runway Project
oLEMP	Outline Landscape and Ecology Management Plan
RGC	Riverside Green Chain
SAC	Special Area of Conservation
SNCI	Site of Nature Conservation Importance
UOS	Urban Open Space