

TOPIC PAPER 4: Air Quality, Noise and Flood Risk

The way that the whole town develops in the future will be affected by planning decisions. Crawley Borough Council has started work on a new local plan that will help to guide development in Crawley over 15 years from 2014-2029.

This consultation period forms part of the early engagement, and further consultation stages are planned before the new Crawley Borough Local Plan is adopted in 2014. Comments received to earlier consultation periods, including to the Topic Papers in 2009, the Town Centre North Supplementary Planning Document and the Manor Royal Masterplan, will continue to be taken into consideration, alongside the technical evidence base, when formulating the Local Plan Preferred Strategy. The Preferred Strategy will be made available for a further period of consultation later in 2012.

This is your opportunity to shape the way the town develops and the council would appreciate and value any comments you have on this Topic Paper or any of the others that form part of this consultation.

Consultation Questions:

- ENV1. Both air quality and noise are an issue for the Borough but are covered by national planning guidance and other legislation and regulations. Is it necessary for the Local Plan to include a locally specific policy to guide development likely to be affected by, or result in an increase in, issues of air quality and noise?
- ENV2. Should local 'quiet areas' be designated through the Local Plan?
- ENV3. Should a locally-specific flood risk policy refer to the findings of the current Strategic Flood Risk Assessment?
- ENV4. How often should the council update the Strategic Flood Risk Assessment?
- ENV5. Could environmental constraints such as air quality, noise and flooding be dealt with under a single policy, or would these issues be best addressed separately?

Summary of Current Context:

The government's national planning guidance relating to air quality and noise is set out in Planning Policy Statement 23: Planning and Pollution Control (PPS23) and Planning Policy Guidance 24: Planning and Noise (PPG24). These documents outline that regard should be given to the location of development which may cause noise and/or pollution, such as industry, and should also ensure that new developments are not located in areas where they would be affected by major existing or future sources of noise and/or pollution.

Government guidance has also been produced in relation to flooding, Planning Policy Statement 25: Development and Flood Risk (PPS25). This guidance sets out that flood risk should be taken into account at all stages of the planning process in order to avoid inappropriate development in areas at risk of flooding. New development should not increase flood risk elsewhere.

Key Issues:

Crawley is unique when compared to other towns in the region. The Borough is mainly urban in character, and is situated adjacent to the M23, close to the M25, and contains a major international airport, Gatwick, within its boundaries. The town is also home to Manor Royal and County Oak, one of the largest employment areas in this part of the South East. These uses play a vital role in promoting a successful and vibrant economy in the Borough, creating jobs and attracting business, though it is also important to note that such uses can create noise and pollution impacts.

Air Quality

- The council's Environmental Health team monitor air quality within the Borough for NO₂ and PM₁₀ pollution. In 2010 there were localised exceedences of acceptable levels of NO₂ pollution under EU law. A constant monitor has been installed to determine whether exceedence was a one off or is a consistent problem. If air quality objectives are exceeded, an Air Quality Management Area (AQMA) should be declared, and an Action Plan prepared.
- Though there are not currently any designated Air Quality Management Areas within Crawley, it is also important to consider that air pollution from Crawley-based sources, including Gatwick Airport and Manor Royal, can impact upon air quality in adjoining districts.

Noise

- Noise remains a key issue in the town, particularly in light of the government identifying need for additional runway capacity in the South East.
- Although the government has ruled out providing a third runway at Heathrow during the present administration, there are no clear indications of whether they will require a second runway at Gatwick. The council is required to safeguard land for possible development of a second runway at Gatwick Airport post 2019, should this be required (for further information see Topic Paper 9: Gatwick).
- As such, the impact of existing noise, and possible impact of future noise remains a key issue to be considered as part of the new Local Plan preparation.
- The Environmental Noise Regulations (England) 2006 require noise mapping of Crawley in 2012, which will be carried out by Defra. As part of that process the council must identify 'quiet areas' for protection against noise. This should be considered during the preparation of the Local Plan and the results incorporated when completed.
- Councils of East and West Sussex are currently preparing a joint document 'Guidance on Noise', to advise planners on a consistent approach to development. It is expected that this will be consulted on and adopted during the time of the preparation of the Local Plan, and will provide local planning guidance in the event of the revocation of PPG24.

Flood Risk

- Parts of Crawley are at risk of flooding from the upper reaches of the River Mole, including the Gatwick Stream, Tilgate Stream, Crawters Brook and Ifield Brook. The Borough's water environment provides an important leisure and visual role in a predominantly urban area, but several high profile flood events have highlighted the need to manage flood risk.

Options:

Noise & Air Quality

- The council wants Crawley to be a place where people want to live, work and visit. To make this happen, there is a need to ensure that different kinds of development, such as housing and employment, are built in the most appropriate locations.
- Planning can play an important role in determining the correct location for development, for example, directing sensitive uses such as housing or schools away from areas of noise, poor air quality, and flood risk, and through directing new industrial development away from existing housing or schools.
- In relation to both noise and pollution, guidance has already been set out at the national level by PPS23 (relating to pollution and air quality) and PPG24 (relating to noise).
- This guidance sets out a clear rationale as to where sensitive development should be located in relation to existing noise/pollution sources, and also sets out guidance to where potentially polluting (including noise and air) development should be located.
- However, given Crawley's location adjacent to Gatwick Airport, and the possibility of a second runway at Gatwick, noise and air quality could potentially be considered to be locally specific to Crawley, allowing for a localised noise policy. As such, possible options are:
 - to rely upon existing government guidance to direct sensitive development away from existing/potential sources of poor air quality and noise, and ensure that proposals likely to result in impact on noise and air quality are appropriately located.
 - To produce a locally-specific policy to manage development and noise/air quality within the Borough. The Local Authorities of East and West Sussex are preparing local planning guidance on noise that could be used after the revocation of PPG24. This could be further refined and adopted for Crawley's local circumstances.

Flood Risk

- In relation to flooding, the national policy statement – PPS25 – sets out guidance requiring local authorities to steer vulnerable development (for example schools, housing and emergency services) away from areas of flood risk, though acknowledges that water compatible and less vulnerable uses (for example, nature reserves and parks) may be appropriate in these locations. This approach is also reflected in the draft National Planning Policy Framework.
- Planning guidance has been provided to the council through the Strategic Flood Risk Assessment review (2010). This document provides up to date locally specific flood risk maps to assist in ensuring that vulnerable development is directed away from areas where the risk of flooding is greatest.
- Further detail is provided in the Gatwick Sub-Region Outline Water Cycle Study (2011). This recommends that to reduce surface water flooding, particularly downstream in Reigate and Banstead, Development Plan Documents should include policies that promote sustainable drainage techniques in all developments. As part of any SuDS policy it is suggested that any redeveloped brownfield sites disconnect their surface water drainage from the foul network.
- Projects are underway to reduce flood risk within the region, most notably the

Environment Agency's Upper Mole Flood Alleviation Scheme. Work has been completed on the first stage of the project, which has involved raising the height of the dam at Tilgate Park. Later stages of the scheme are expected to be complete by March 2014 including flood attenuation schemes at Clays Lake, Ifield and Worth Farm and environmental enhancement works at Grattons Park.

- In light of the government guidance, the main options relating to flooding are:
 - To produce a locally specific policy requiring developers to accord with the findings of the current Strategic Flood Risk Assessment in order to avoid areas of greatest flood risk, avoid increasing the risk of flooding elsewhere, and where appropriate ensure appropriate flood mitigation measures are in place.
 - To carry out an annual update of the Strategic Flood Risk Assessment, or review this document as and when required.

Indication of Potential Direction:

- In light of the requirement that local authorities do not repeat national and regional guidance, the council are currently proposing to rely upon existing government guidance to manage applications relating to noise and air quality within the Borough. In the event that this is lost, EU regulations will still apply, and Crawley is working with local partners to develop local noise planning guidance.
- Local planning guidance on acceptable noise levels, and the identification of local 'quiet areas' could be adopted as part of the local plan.
- It is suggested that issues of flood risk are locally specific, and should be addressed through the Local Plan, drawing upon evidence set out in the Strategic Flood Risk Assessment (2012) and Gatwick Sub-Region Water Cycle Study (2011). At this stage, the preferred approach would be for the Local Plan to incorporate a specific flood risk policy directing development to comply with national guidance, and more specifically, the local level recommendations of the Strategic Flood Risk Assessment and Water Cycle Study.
- It is suggested that future updates of the Strategic Flood Risk Assessment are undertaken as and when required.

Evidence Base:

- Planning Policy Statement 23: Planning and Pollution Control
 - Advises on situations where air quality should be a material consideration in planning decisions, particularly regarding the potential impact upon health, the natural environment and general amenity. Attention is drawn to the need to consider existing, and likely future air quality in the area, including any Air Quality Management Areas.
- Planning Policy Guidance 24: Planning and Noise
 - Requires Local Authorities to consider whether proposals for new noise sensitive development would be compatible with existing activities.
 - Development should not be permitted in areas which are, or are expected to become, subject to unacceptably high levels of noise in the foreseeable future.
 - For new dwellings or noise sensitive development affected by aircraft noise

contours, Annex 1 of PPG24 identifies a desirable upper limit of 60 Leq dB(A)¹ is stated, with a level of 57 Leq dB(A) considered to mark the onset of significant community annoyance.

- Planning Policy Statement 25: Development and Flood Risk
 - Sets out that flood risk must be taken into account at all stages of the planning process in order to avoid inappropriate development in areas at risk of flooding.
 - Where development in a flood risk area is unavoidable, and justified via the exception test, appropriate flood mitigation measures should be undertaken. Development should not increase flood risk elsewhere.
- South East Plan
 - Policy NRM4: Sustainable Flood Risk Management
 - Policy NRM8: Air Quality
 - Policy NRM10: Noise
- Crawley Borough Adopted Core Strategy
 - Policy H3 outlines that residential development will be steered towards locations which are not subject to major physical or environmental constraints. Further guidance is provided under 'saved' Local Plan Policies GD16-23.
- Crawley Borough Local Air Quality Management Detailed Assessment of Air Quality (2007) and Crawley Borough Local Air Quality Management Progress Report (2008)
 - The council is required to assess air quality within Crawley, and where exceedences of national air quality objectives are identified, an Air Quality Management Area should be declared.
 - There are not currently any Air Quality Management Areas declared within the Borough.
- Crawley Borough Strategic Flood Risk Assessment (January 2012)
 - Identifies areas of Low, Medium and High Flood Risk.
 - Sets out that a relatively low proportion of the Borough is affected by flooding from the River Mole and its tributaries.
 - Sets out recommendations as to the types of development likely to be acceptable in each of the flood risk areas.
- Gatwick Sub-Region Water Cycle Study (January 2011)
 - Recommends that Development Plan Documents should include policies that promote sustainable drainage techniques in all developments.
 - Outlines that redeveloped brownfield sites disconnect their surface water drainage from the foul network.

¹ Decibels measured on a sound level meter incorporating a frequency weighting ('A' Weighting) which differentiates between sound of different frequency (pitch).