

Crawley Local Plan 2024-2040 Examination

Inspectors' Matters, Issues and Questions (MIQs)

9 October 2023

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Important Notes:

- **Participants should only respond to the questions which directly relate to their previously submitted written representations on the plan.** Please clearly indicate in your statement(s) the question(s) you are answering.
- Statements should not exceed 3,000 words per Matter.
- Statements for Matters 1, 2, 3 (Issue 1), Matters 4, 5 and Matter 8 (Issue 2) should be submitted to the Programme Officer no later than 12 noon on Friday 3 November 2023.
- Statements for Matters 3 (Issue 2), 6, 7, 8 (Issues 1 & 3), 9, 10 and 11 should be submitted to the Programme Officer no later than 12 noon on Friday 15 December 2023. Late responses will not be accepted. Please see the separately published guidance notes for further details.
- The examination is that of the May 2023 plan as submitted by the Council [document CBLP/01]. Therefore, the examination will not, at this stage, be considering the merits of sites for development that are not included in the Plan ("omission sites"). Should it be determined that there is a need for additional or different sites to be allocated, the Inspectors will, in the first instance, ask the Council to consider how it would wish to proceed with the Examination.
- The questions concerning soundness are primarily focussed on the plan's policies. Insofar as they relate to the plan's soundness, the examination will be considering the soundness of other elements of the plan including supporting text and appendices and these will be considered as part of the discussion on relevant policies.
- Examination of consistency with national policy will relate to the July 2021 version of the National Planning Policy Framework (NPPF) and relevant sections of the Planning Practice Guidance (PPG).
- The Council on submitting the plan has provided a number of statements of common ground, which those wishing to submit further statements may find particularly helpful.

Matter 1: Legal Compliance and General Plan-making

Issue 1: Plan-making

- 1.1 Has preparation of the plan complied with the Local Development Scheme, Statement of Community Involvement and the requirements of the 2012 Local Planning Regulations?
- 1.2 Is it clear which development plan policies (2015 Crawley Local Plan) would be superseded on adoption of the submitted Plan? [Regulation 8(5) of the 2012 Local Plan Regulations requires that superseded policies must be identified]. Are there any development plan document policies that are intended to be 'saved' on adoption of the Borough Local Plan 2024-2040?
- 1.3 For the purposes of strategic planning and any subsequent neighbourhood plan preparation does the submitted plan clearly identify which policies would be 'strategic policies'? Is the identification of strategic policies justified and consistent with NPPF paragraph 20? For example, is it justified that Policy DD4 (Tree Replacement Standards) is labelled a strategic policy? Should policies on matters such as water resources (SDC4 for example) be identified as strategic policies?
- 1.4 How have issues of equality been addressed in the Local Plan? In what way does the Plan seek to ensure that due regard is had to the three aims¹ expressed in Section 149 of the Equality Act 2010 in relation to those who have a relevant protected characteristic?
- 1.5 What is the intended base date of the plan and the plan period? Is the base date 1 April 2023 and the plan period 2023/4 to 2039/40?

Issue 2: Duty to Co-operate

- 1.6 What mechanisms have been established between authorities on cross-boundary strategic matters? Do the signed statements of common ground demonstrate effective and on-going joint working, as per NPPF paragraphs 26 and 27 and PPG paragraphs 61-009-20190315 to 61-017-20190315?
- 1.7 Given past unmet needs arising in Crawley and the fact that significant unmet needs have again arisen for this Plan, has any consideration been given to a wider planning strategy or joint evidence base within the Housing Market Area (HMA) as a mechanism to collaboratively test the extent to which housing needs (and associated infrastructure issues) within the wider HMA could be addressed across administrative boundaries to secure a sustainable pattern of development?

¹ At Section 149(1) of the Equality Act 2010 – (1) eliminate discrimination; (2) advance equality of opportunity; and (3) foster good relations.

- 1.8 Should the Statement of Common Ground with Northern West Sussex Housing Market Area authorities be interpreted as a strategy for addressing the unmet need? Can that only go as far as anticipating (hoping) that neighbouring authority plan reviews can accommodate as much of Crawley's unmet housing need as possible? Is that compatible with PPG paragraph 61-022-20190315 which in the context of unmet needs refers to making "every effort to secure necessary cooperation"?
- 1.9 Under the approach of sequentially prioritising unmet housing need within the HMA, has there been any discussion on synchronising the timeframes for plan reviews within the HMA as far as practicably possible so that examination of Crawley's Local Plan could take place in context of increased certainty as to the extent to which other plans in the HMA were (or were not) capable of meeting unmet needs?
- 1.10 What mechanisms will Crawley Borough Council have in shaping neighbouring plan reviews, particularly any sustainable options 'At Crawley' where maximising delivery could, potentially, assist in meeting the Borough's unmet housing needs?
- 1.11 The evidence before this examination includes initial stages of plan-making in Horsham and Mid Sussex that are considering strategic growth proposals 'At Crawley' in respect of West of Ifield (Homes England) and Crabtree Park (Wates) respectively. Has the duty to cooperate process explored the potential of such growth to have strategic implications for infrastructure within Crawley Borough - for example on the strategic road network (see representations from National Highways), secondary education and wastewater treatment capacity? Is there a risk that the submitted Plan for Crawley to 2040 could impede future sustainable patterns of growth 'At Crawley' or does the submitted Plan sufficiently countenance this (for example the area of search for the Crawley Western Multi-Modal Link)?

Issue 3: Habitat Regulations Assessment

- 1.12 Is the Habitats Regulation Assessment (HRA) – January 2023 (Document KD.HRA.01) robust in concluding, after carrying out an appropriate assessment, that the policies and proposals in the plan (alone or in combination with other plans/projects) would not have an adverse effect on the integrity of proximate protected sites?
- 1.13 Is there sufficient certainty with regards to protected habitats in the Arun Valley that potentially adverse effects on the qualifying features of these habitats arising from policies and proposals in the Plan (in combination with other plans and projects) with regards to water neutrality can be avoided through effective mitigation? Is there sufficient evidence, for example from pilot projects or modelling, to inform the appropriate

assessment's analysis that proposed mitigation would be effective? Can a positive conclusion under the Habitats Regulations be arrived at when the details of implementing an offsetting scheme are presently being worked on?

Issue 4: Climate Change

- 1.14 Has the Council had regard to Section 19 of the 2004 Planning & Compulsory Purchase Act (As amended) requiring development plan documents to include policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change? Which are the policies and how will they be monitored for their effectiveness?
- 1.15 Is the plan's approach to flood risk, including the site selection process, consistent with national policy and suitably precautionary, including modelling for the long term, to take account of the effects of climate change? Will the update to the Strategic Flood Risk Assessment (due mid November 2023) appropriately conclude the evidence required on this matter?

Issue 5: Sustainability Appraisal (including Strategic Environmental Assessment)

- 1.16 Does the Sustainability Appraisal (SA) (Document KD.SA.01) adequately and reasonably assess the likely effects of the policies and proposals of the Plan against the SA objectives (issues) and test the preferred / selected policy approach against any reasonable alternatives?
- 1.17 Does SA adequately record why alternative options have been discounted?
- 1.18 Does the SA (including SEA) adequately address the issue of water neutrality (noting that both Natural England and the Environment Agency have both confirmed at Regulation 19 that they have no concerns regarding the SA/SEA for the Plan)?
- 1.19 Ultimately, does the SA report demonstrate that the submitted plan is justified, in that it comprises an appropriate strategy, having assessed any reasonable alternatives?

Issue 6: Policies Map

- 1.20 Would it be necessary on plan adoption to modify or update the submitted Policies Map to (a) amend the buffer zone around the safeguarded minerals railhead; and (b) to show the brick clay safeguarding area in the West Sussex Joint Minerals Plan 2018 (Partial Review 2021)?

Matter 2: Spatial Strategy

Issue 1: Whether the Spatial Strategy is sound.

- 2.1 Given the significant level of unmet housing need, which remains to be positively accounted for, is the proposed spatial strategy for Crawley soundly based?
- 2.2 Are there any reasonable alternative spatial strategies for the Borough that could result in a material difference in respect of the level of unmet housing need?
- 2.3 Representations on the plan suggest that comprehensive estate regeneration within the town could yield additional homes. Is that a reasonable alternative strategy within the plan period?
- 2.4 Gatwick Airport and operational activities in support of the airport is clearly a key part of any spatial strategy for the Borough. In general terms, safeguarded land for the airport (under Policy GAT2) applies to the remaining tracts of undeveloped land within the Borough. If the extent of safeguarded land was not necessary or was not found to be sound as part of this examination, would that necessarily result in a different spatial strategy, especially in terms of options to meeting housing needs? Would it be premature to conclude on that now or are there known principles (such as noise levels) which mean safeguarding has limited bearing on a spatial strategy to meet housing needs in the Borough?

Issue 2: Whether the Plan is justified and effective in relation to the prospect of development adjacent to Crawley.

- 2.5 Is the plan sufficiently flexible and sensitive to potential options for growth 'At Crawley' that may occur in Horsham and Mid Sussex districts? Would plan review be an appropriate mechanism if strategic growth around Crawley was determined to be a sound spatial strategy for neighbouring authorities?
- 2.6 Is the proposed content in the Plan at paragraph 12.23 on the circumstances where development proposals adjacent to Crawley will be supported justified? Will it be effective in influencing spatial strategies or adjoining development proposals at either the plan preparation or decision-making stages in neighbouring authorities?
- 2.7 Is paragraph 12.23 justified at point (ii) in seeking/requiring the completion of a Western Link prior to the (first) completion of dwellings? Is that supported by the available evidence base?
- 2.8 Does criterion xi) at paragraph 12.23 need to be amended to ensure consistency with national planning policy at NPPF paragraph 180c) which

caveats the loss or deterioration of irreplaceable habitats with “unless there are wholly exceptional reasons, and a suitable compensation strategy exists”?

Issue 3: Whether Policies SD1 and SD2 in terms of over-arching policies for sustainable development are sound.

- 2.9 Are the strategic objectives in Strategic Policy SD1 reflective of the spatial issues and priorities identified during the preparation of the plan including the sustainability appraisal baseline and the sustainability objectives set out at Appendix A of the Plan?
- 2.10 Is Strategic Policy SD2 justified by evidence that health and wellbeing is a particular issue for the Borough? How is the effectiveness of the policy intended to be measured and what is Policy SD2 expected to achieve / contribute towards over the plan period?

Matter 3 – Housing Needs

Issue 1: Whether the Local Plan has been positively prepared and whether it is justified, effective and consistent with national policy in relation to housing need and the housing requirement.

- 3.1 Has the calculation of Local Housing Need (755 homes per annum) been undertaken appropriately using the standard method and correct inputs? Does it reflect up-to-date workplace-based affordability ratios?
- 3.2 Are there the circumstances in Crawley, having regard to PPG paragraphs 2a-002-20190220 and 2a-003-20190220, to indicate that an alternative level of housing need would be justified for the Borough thus resulting in a higher or lower housing requirement and associated consequences for any level of unmet housing need?
- 3.3 Given the scale of unmet need (7,050 homes) has plan preparation made every effort to optimise and increase housing delivery within the Borough as part of a spatial strategy that would deliver sustainable development?
- 3.4 It is suggested in various representations that sources such as estate regeneration and further mixed use of employment areas could yield additional housing numbers, reducing the scale of unmet need. During the preparation of the plan, has every conceivable source of housing supply been robustly assessed and where necessary appropriately discounted?
- 3.5 Does the policy framework of the Plan, for example Policies H3a-f (housing typologies) and TC3 (town centre key opportunity sites), provide a positively prepared and justified basis on which to make effective use of land within the Borough in order to support positive housing delivery?
- 3.6 Given the evidence in the Strategic Housing Land Availability Assessment, the Crawley Compact Residential Development Study and on plan-wide viability, would potentially even higher densities, particularly in and around the town centre, be an appropriate strategy?
- 3.7 Given the housing requirement for the plan is supply-led, has the assessment of land supply within the Borough, realistically and robustly profiled when deliverable and developable sites are likely to come forward and the capacity that is likely to be yielded? Is there a risk that the supply (the housing requirement) has been significantly under-calculated? Does evidence of recent over-delivery in the Borough against the Housing Delivery Test indicate a risk that the housing requirement could be too cautious (and so the level of unmet need reduced)?

Issue 2: Whether the assessment of housing and accommodation needs of Gypsies, Travellers and Travelling Showpersons is sound.

[Please Note: An update to the Gypsy Traveller and Travelling Showpeople Accommodation Needs Assessment Submission Draft July 2023 (H/HN/02) is due to be submitted in November 2023. If required, the Inspectors may issue supplementary questions to those set out below and enable interested persons to respond in statements due on 15 December.]

- 3.8 Is the plan supported by an up-to-date assessment of the needs of Gypsies, Travellers and Travelling Showpersons that is consistent with national policy?
- 3.9 Does the assessment of need take account of those who may have ceased travelling but seek culturally appropriate accommodation, having regard to equalities issues raised in the recent Lisa Smith judgment²?
- 3.10 Is there a risk that need is being under-recorded because of historically constrained supply / lack of sites in the Borough?
- 3.11 Have reasonable efforts been made to engage with gypsy and traveller households in Crawley, including those who may be residing in 'bricks and mortar'? Are the sample sizes of households interviewed robust and is the GTAA informed by regular, reliable caravan counts, including any unauthorised encampments?
- 3.12 Is the conclusion of no immediate need, in years 1-5, justified? Is there evidence of immediate need, including from temporary consents in the Borough and potentially any wider unmet need in West Sussex?

² Lisa Smith v SSLUHC, North West Leicestershire DC et al [2022] EWCA Civ 1391

Matter 4: Economic Growth

Issue 1: Whether the employment land requirement (Policy EC1) will support sustainable economic growth.

- 4.1 Is the employment land requirement identified in the Plan soundly based? Is it consistent with national policy at NPPF paragraphs 81-83 in terms of positively and proactively encouraging sustainable economic growth in the Borough? Does the proposed approach to employment land in the Plan provide the appropriate conditions for businesses to invest, expand and adapt?
- 4.2 Including by reference to PPG paragraphs 2a-026-20190220 and 2a-027-20190220 does the analysis and assessment of employment land required over the plan period take sufficient account of local economic strategies, market demand, the current condition and employment land stock (including losses of employment space to other uses) and local market signals?
- 4.3 Is the submitted Plan consistent with the economic priorities for the Local Enterprise Partnership(s) and Gatwick Diamond and will it appropriately support Crawley as the prime industrial location in Northern West Sussex?
- 4.4 Does the plan provide sufficient flexibility to accommodate needs not anticipated in the Plan and to enable a rapid response to changes in economic circumstances in accordance with NPPF paragraph 82(d)?
- 4.5 Does the Economic Growth Assessment (EGA) evidence inform an appropriate strategy for the Local Plan in terms of looking at both baseline jobs growth and past development rates in terms of the figure of 26.2ha representing a positively prepared approach in planning for sustainable economic growth? The 26.2ha is expressed as a minimum requirement yet the submitted plan does not appear to allocate more than the net 13.73ha needed to achieve 26.2ha over the plan period. Is that correct or does the 44ha Gatwick Green site provide a buffer?
- 4.6 Does the latest Economic Growth Assessment (EGA) Supplementary Update for Crawley 2023 potentially underplay the likely demand for additional employment land over the plan period by: (i) extrapolating growth from 2011-21 which would include an element of suppression during the Covid-19 pandemic; and (ii) factoring-in past constraints in land supply in the Borough?
- 4.7 Is the interpretation of the economic land forecasts in the EGA, and as explained in Topic Paper No.5, reasonable and reliable?
- 4.8 Is the employment land provision in the plan aiming to provide the minimum necessary to support the Plan's housing requirement (314dpa)?

The local housing need is forecast to be significantly higher (755dpa), which historically has been met by adjoining authorities. Is there an additional requirement for employment land to support labour demands from the projected increase in local housing need and how would this be met?

- 4.9 The NPPF refers to flexibility and often an element of 'buffer' is built into employment land requirements. Is the proposed 10% buffer in the EGA justified in light of the circumstances in Crawley including potentially past constraints in supply and any trends in replacement / loss of existing stock?
- 4.10 What reasonable alternative employment land scenarios have been considered through the Sustainability Appraisal process?
- 4.11 Is it necessary for soundness to increase the employment land requirement in Crawley to ensure there is a strong, competitive economy over the plan period? If so, what would be a reasonable, alternative figure and could that be accommodated within the Borough under the current safeguarding regime for Gatwick?

Issue 2: Whether the approach to the Main Employment Areas, including Manor Royal, is sound.

- 4.12 Are the main employment areas identified under Policy EC2 soundly based?
- 4.13 Having regard to NPPF paragraphs 82 and 122, does Policy EC2 provide sufficient flexibility to respond to changes in economic circumstances?
- 4.14 Is the identification of Lowfield Heath in Policy EC2 justified, including, amongst other things by reference to its location within safeguarded land for Gatwick Airport? Would it be necessary for soundness to clarify the type of development that may be compatible with Lowfield Heath's location in a safeguarded area?
- 4.15 As part of the assessment of the capacity within the Borough for new homes, has appropriate consideration been given to potential intensification of employment areas for mixed use or alternative forms of employment provision which could create some capacity for additional housing? Does the plan-wide viability evidence indicate whether such an approach would be effective?
- 4.16 Is Policy EC3 on Manor Royal justified to require accordance with the 2013 Supplementary Planning Document (SPD) rather than state that development proposals "should have regard to" the SPD? Is there any intention to review and update the SPD?

- 4.17 Does Policy EC3 provide an appropriate policy framework to support and enhance the strategic role and function of Manor Royal within the Gatwick Diamond area? Would it be necessary for soundness to modify the plan to further restrict or manage non-employment uses including from the effects of Class E?

Issue 3: Whether the approach to the Strategic Employment Location at Gatwick Green (Policy EC4) is sound.

- 4.18 Having regard to safeguarded land for Gatwick Airport, master-planning for Gatwick Airport, land ownerships and the need to achieve safe and suitable access to the highway network, is the proposed Gatwick Green allocation deliverable and capable of meeting employment needs in the Borough during the plan period?
- 4.19 Does the evidence, including any local market intelligence, demonstrate that Gatwick Green would be an attractive location for both small-scale industrial stock and larger footplates for storage and distribution uses?
- 4.20 Would Gatwick Green hinder sustainable aviation growth as envisaged in the Government's Draft Aviation Strategy to 2050 (2018)?
- 4.21 What engagement has there been during the preparation of the Plan with Gatwick Airport on the implications of Gatwick Green and the assessment that long-stay surface parking would not be an efficient use of the land?
- 4.22 Is the extent / shape of the allocation justified and would it result in a coherent development site in terms of securing high quality design, strategic landscaping and integrated connectivity within the wider site but also to adjoining land uses?
- 4.23 Is the net developable area of 13.73ha justified within the context of the overall scale of the allocation? Is it effective to express the 13.73ha as a minimum but to subsequently require additional employment proposals beyond 13.73ha to be supported by appropriate evidence?
- 4.24 What would be the consequences of reducing the Gatwick Green allocation to more closely align with the net employment land requirement (13.73ha)?
- 4.25 Is Gatwick Green sustainably located in terms of modal shift for prospective employees and connectivity by means other than private car? Are the policy requirements at criteria (f) and (g) of Policy EC4 feasible?
- 4.26 Is the Gatwick Green allocation underpinned by an evidence base, proportionate to plan-making, that the site can come forward (for predominantly warehouse/logistic uses) without causing unacceptable impact on highway safety, or that residual cumulative impacts on the road

network would not be severe? Does the transport modelling for the Plan demonstrate that the allocation is deliverable?

- 4.27 How will the allocation be accessed and ultimately how will goods vehicles connect to the strategic road network? Is the allocation dependent on any significant highway works in order to ultimately connect to the strategic road network? If so, is this viable? Will the proposed criteria on movement and accessibility in Policy EC4 be effective in managing access to the site and implications for the highway network?
- 4.28 If the allocation is found sound and the plan adopted in 2024, when would a first development likely be completed on the Gatwick Green site? Is the Employment Land Trajectory within the Plan soundly based and reflective of the evidence for Policy EC4? Could the allocation come forward within the early part of the plan period to promptly respond to demand for employment land? If Gatwick Green fails to come forward in a timely manner what are the contingencies/buffers to ensure demand for new employment premises and land is met? Would the fall back be a review of the Plan? Would that be sound given the NPPF position on flexibility?
- 4.29 Is the extent of safeguarded land around the Gatwick Green site justified having regard to the Airport Masterplan and the need to deliver access improvements to the Gatwick Green site?
- 4.30 Part m of Policy EC4 requires an Agricultural Land Classification Statement. Is this justified? Has plan preparation, including SA, considered land quality in terms set out at NPPF paragraph 174(b) in recognising the benefits of best and most versatile agricultural land?
- 4.31 Were any alternative reasonable options to Gatwick Green assessed as part of the SA?
- 4.32 Has the duty to cooperate considered any alternative strategy to employment land provision were Gatwick Green not found sound? Has the option of looking beyond the Borough's boundaries for employment land been appropriately tested in SA as alternative option 2 for Policy EC1?

Issue 4: Whether the plan would provide a sound basis for supporting a diverse economy in the borough.

- 4.33 Is Policy EC5 on employment and skills development justified and viable? Is there potential flexibility in how the objective of the policy could be secured, for example means other than a financial contribution as set out at part ii) of the policy? Is it intended that major developments would have to comply with both criteria (i) and (ii)?

- 4.34 Is Policy EC7 justified and consistent with national policy in identifying Gatwick Airport as a location for hotel and visitor accommodation such that proposals at this location would not be subject to a demonstration of need or a sequential approach?

Matter 5: Gatwick Airport

Issue 1: Whether the overall approach to Gatwick Airport is justified, effective and positively prepared.

- 5.1 Is the airport boundary, as a planning policy designation for the purposes of implementing Policies EC1, EC2 and EC7 and Policies GAT1-4, soundly based?
- 5.2 Is Policy GAT1 sound in terms of dealing with growth of the Airport in the context of a single runway and its approach to securing sustainable growth of aviation including avoiding / minimising adverse impacts and securing appropriate mitigation?
- 5.3 Is the final paragraph of GAT1 a sound approach given the current situation of this plan examination occurring in parallel with a Development Consent Order (DCO) application for a major project envisaged in the 2019 Gatwick Airport Master Plan?
- 5.4 Can Policy GAT1 be found sound in advance of the outcome of the DCO process and the implications, if the project receives consent, dealt with as part of any subsequent plan review?
- 5.5 Without prejudice to the Borough Council's position on the DCO project, has there been sufficient foresight during the preparation of this Plan in respect of the DCO project, for example transport modelling and in the SA, that appropriately considers any in-combination impacts? Is there any reason to delay adoption of the Local Plan pending the outcome of the DCO process?
- 5.6 What are the infrastructure considerations should Gatwick Airport continue to expand using its current single runway model?
- 5.7 Is the approach in criterion ii) of Policy GAT1 an effective mechanism to assess proposals within the airport boundary? Does it allow for a balancing exercise that would take into account any positive benefits?
- 5.8 What does compensation in part ii) of Policy GAT1 refer to in the context of planning and land use considerations?

- 5.9 Would it be necessary for plan soundness to amend part iii) of Policy GAT1 to replace 'like for like' compensation with 'fair' compensation in relation to biodiversity?
- 5.10 How has the transport assessment work for the Local Plan, including the sensitivity testing (documents at ES/ST/01w) dealt with Gatwick Airport in the context of Policy GAT1, particularly in terms of potential cumulative impacts? Has the additional sensitivity testing work involved the input of West Sussex County Council and National Highways? Is there any consensus or common ground that the plan as submitted remains sound in terms of transport impacts and infrastructure or are potential main modifications required?
- 5.11 Is the approach in Policy GAT3 to Gatwick Airport related parking soundly based (in large part as a continuation of 2015 Local Plan policy)?
- 5.12 Would Policy GAT3 provide an effective framework for managing car parking demand associated with the airport within the Borough, having regard to, amongst others, permitted development rights on airport "operational land", the latest Airport Surface Access Strategy and objectives for modal shift related to the Airport's operations?
- 5.13 Does Policy GAT4 provide a justified and effective framework for non airport related employment floorspace within the airport boundary?
- 5.14 What is the role of the Gatwick Airport Supplementary Planning Document (SPD) and what will an update to the SPD do in terms of supporting the implementation of the submitted Local Plan policies?
- 5.15 Gatwick Airport have raised various comments regarding the need to amend supporting text to Policy DD5 (Aerodrome Safeguarding) for factual / technical accuracy reasons. Is there agreement that the modifications presented in document CBLP07 would address the concerns and these are not necessarily main modifications needed for plan soundness?

Issue 2: Whether the approach to safeguarded land at Policy GAT2 is soundly based.

- 5.16 What did the initial testing of options for Gatwick safeguarding at Regulation 18 reveal in terms of the approach to be taken in the local plan? How have matters evolved through the successive rounds of Regulation 19?
- 5.17 Is there the robust evidence, as required by NPPF paragraph 106, to support the extent of safeguarded land under Policy GAT2?

- 5.18 The Gatwick Airport Masterplan 2019 states that the airport is no longer actively pursuing a scenario for plans for an additional southern runway, but a future possibility remains to build and operate one. Is a precautionary approach to safeguarding justified given the current lack of certainty on a potential future second wide-spaced runway?
- 5.19 Is the 2019 Gatwick Airport Masterplan the core of the robust evidence that supports maintaining the safeguarded land designation, in the terms sought by NPPF paragraph 106?
- 5.20 Do the Airports National Policy Statement (APNS) and the 2020 Supreme Court decision in respect of Heathrow provide a level of evidence to indicate that safeguarding is no longer required for Gatwick?
- 5.21 Would plan review be the appropriate mechanism to consider the necessity for continued safeguarding? What would be the likely trigger in relation to Gatwick and safeguarded land to prompt a plan review? Is the outcome of the National Infrastructure Commission work on airport capacity the source that would potentially provide the necessary certainty?
- 5.22 Does the submitted plan's approach of removing areas from safeguarded land and establishing areas of search for the Crawley Western Link within the safeguarded area render the principle of safeguarding ineffective? Does the Plan retain a practicable area of safeguarded land that would enable an additional wide-spaced runway to the south of Gatwick?
- 5.23 Is the approach to safeguarded land east of Balcombe Road justified? If the principle of not safeguarding land shown for surface car parking in Gatwick Master Plan is acceptable for the Gatwick Green proposal in Policy EC4 is a more consistent approach required for plan soundness with regards to any residual safeguarded land east of Balcombe Road?
- 5.24 Is Gatwick Green justified in the context that the Gatwick Airport Master Plan 2019 envisages surface car parking in this location? If Gatwick Green is found sound, and having regard to the Airport Surface Access Strategy, the 2022 Section106 agreement, and the DCO proposals, would there be any significant adverse impacts for accessibility to Gatwick Airport?
- 5.25 There are a number of sites being promoted for employment uses within safeguarded land or proposed to be removed from safeguarded land (helpfully provided on page 31 of Topic Paper No.5 – extract of Fig ii from the Crawley ELAA, 31 March 2023). Has the site selection process for employment land been robust and consistent and is it transparently set out in the supporting evidence to the Plan, including the SA?

- 5.26 Is it justified that Gatwick Green is the only site³ capable of meeting the Borough's employment land needs without prejudicing the future delivery of a southern runway?
- 5.27 Is the Plan effective at paragraph 10.19 in what is meant by 'small-scale' development that could be permissible within the safeguarded area in accordance with Policy GAT2? Should temporary uses/permissions be included?
- 5.28 Is it justified and effective that the area shown for safeguarded land overlaps with areas of land designated under Policy EC3 for Manor Royal (for example land north of Fleming Way)? Have alternative options for the boundaries of safeguarded land under Policy GAT2 been assessed?
- 5.29 The safeguarding area in the submitted plan extends further south into Manor Royal compared to the 2015 Local Plan. Is this justified and would it remove the flexibility at the fringes of Manor Royal intended in the 2015 Local Plan?
- 5.30 Is paragraph 10.18 of the Plan effective in specifying that it would be a review of national aviation policy that would be the trigger for reassessing the currently safeguarded area?

³ Paragraph 4.56, Topic Paper No. 5 Employment Needs and Land Supply – July 2023

Matter 6: Housing Delivery

Issue 1: Whether the policy approach to the proposed key housing sites is soundly based

- 6.1 Is the content of Policy H2 factually correct in terms of latest permissions and capacities as of 1 April 2023?
- 6.2 Has the assessment of sites in Policy H2 through the SHLAA process, appropriately optimised delivery from these sites? Are any amendments needed to site capacities and their timeframe in the housing trajectories for plan soundness?
- 6.3 Has appropriate regard been given to any ancient woodland or trees within or in close proximity to these sites in terms allocating these sites and assessing their capacity? Would sufficient protection be provided for by Policy GI2? Would it be necessary for soundness to de-allocate or amend the capacity of any H2 sites to account for ancient woodland so as to comply with NPPF paragraph 180c?
- 6.4 Is the inclusion of Land East of Balcombe Road/Street Hill, Pound Hill justified and consistent with national policy and PPG paragraph 013-20190721 in allocating land which contains a Local Wildlife Site as part of ecological networks? Does the policy provide sufficient protection and scope for enhancement of the Local Wildlife Site, including connectivity to wider ecological networks?
- 6.5 Is the proposed allocation of the Tinsley Lane site soundly based, having regard, to amongst other things, the overall provision of sports facilities / pitches to meet the needs of the Borough's population; the vitality and viability of existing sports clubs at the Tinsley Lane site; highway safety and access to the site; amenities of nearby residential properties; and local biodiversity?
- 6.6 What is the status of the Tinsley Lane Development Brief? What does it set out / require that is not in Policy H2 or covered by other policies in the Plan?
- 6.7 Is the policy for Tinsley Lane justified and deliverable in requiring the provision of allotments?
- 6.8 Given the various requirements for the Tinsley Lane site in Policy H2 is there reasonable assurance that residential development would be viable?

Issue 2: Whether the Plan would deliver an appropriate mix of house tenures and types.

- 6.9 Given the significant need for, and importance to the local economy of, affordable housing, does the plan optimise its delivery having appropriate regard to plan-wide viability considerations? Is the approach to smaller sites (less than 10 dwellings) justified and demonstrably viable given the significance of such sites to housing delivery in the Borough?
- 6.10 Is the differentiation in affordable housing provision (proportion and mix) between the town centre and areas outside of the town centre justified?
- 6.11 As part of the duty to cooperate or through other mechanisms (for example the Planning Performance Agreement on West of Ifield) is there a reasonable prospect that Crawley's significant affordable housing need could be positively considered on housing development in adjoining administrative areas adjacent to or very close to the boundary with Crawley through some nomination of Crawley's affordable housing needs being met on these schemes? Is paragraph 12.23 at point vii) justified in seeking 40% affordable housing on prospective urban extensions at Crawley and to seek agreements for nomination rights for those on Crawley Borough's housing register?
- 6.12 Is the approach to affordable care accommodation in Policy H5 justified by the evidence in the SHMA and plan-wide viability assessment? Will it be effective in meeting the needs for affordable forms of housing including those requiring an affordable form of use class C2 accommodation? Is the proposed approach consistent with national planning policy?
- 6.13 Will the Plan be effective in delivering a housing mix that reflects the SHMA evidence in terms of a blend that is steered towards smaller affordable dwellings (1 + 2 bed) and larger market housing (3 & 4+ bed)?
- 6.14 The SHMA identifies that Crawley has, in comparison to the wider HMA, a younger population and a particular issue of affordability for younger households forming in the Borough. Does the Plan at Policy H4 provide an effective response to this aspect of the Borough's housing market? Is the town centre a location where this need (and other housing needs) could be met (in part)?
- 6.15 Given the nature of the housing land supply in the Borough and the numbers on the Council's registers are there any reasonable options to specifically allocate or identify sites for custom or self-build in the Borough? Has the issue of this specific sector of the Borough's housing need and the unmet need been identified or considered through duty to cooperate discussions within the HMA?

- 6.16 Will the Plan be effective in meeting the needs of older persons, consistent with NPPF paragraph 62 and PPG paragraph 63-001-20190626? In addition to the two sites allocated for older persons in Policy H2 is further provision required to meet needs identified in the SHMA? Is older persons housing a specific element of the unmet housing need raised under the duty to cooperate?
- 6.17 Is the proposed approach in Policy H5 to 'Affordable Care' justified and effective? Having regard to NPPF paragraph 58, is it viable and is it capable of practicable implementation on-site? Do the proposed exceptions in the policy provide sufficient flexibility?

Issue 3: Whether Policy H8 provides a sound approach to meeting the accommodation needs of Gypsies, Travellers and Travelling Showpeople

- 6.18 Is the proposed approach of identifying a reserve site for gypsy and traveller provision in Policy H8 justified and consistent with National Policy?
- 6.19 Is the identified reserve site at Broadfield Kennels suitable and deliverable having regard to highway safety from the A264, site gradients, ownership and future management arrangements for a single, larger site?
- 6.20 Are the criteria for assessing 'windfall' proposals for gypsy and traveller accommodation at a)-f) in Policy H8 justified, consistent with national policy and positively prepared?
- 6.21 Have any alternative options to Broadfield Kennels sites been offered (through call for sites process) or assessed through sustainability appraisal?

Issue 4: Whether there would be a deliverable supply on plan adoption and developable supply thereafter to meet the housing requirement.

- 6.22 Recent housing delivery has exceeded the 2015 Local Plan requirement but conversely allocations in 2015 Plan have been slower to come forward than anticipated (para 2.4.2 – Topic Paper No.4). This appears to be a consequence of higher rates of windfall (e.g., former office premises). Going forward, is the housing trajectory robust (particularly on windfalls (having regard to the Windfall Statement)) or is there a risk of continuing over-delivery in the context of a significant unmet need which, under current legislation, is subject to the duty to cooperate?
- 6.23 Does the SHLAA 2022 and other sources of evidence, including the Compact Residential Development Study (2023), demonstrate that "no stone has been left unturned"?

- 6.24 Does the housing trajectory appropriately anticipate some optimisation (maximising capacity) of 2015 Local Plan allocations?
- 6.25 Is the proposed housing trajectory soundly based and consistent with Strategic Housing Land Availability Assessment evidence and latest annual monitoring (base date 23 March 2023)? Are any factual updates required to the trajectory?
- 6.26 Is the profile of annual housing delivery justified and is it to be treated as a front-loaded stepped trajectory?
- 6.27 Does the housing trajectory take account of Water Neutrality and any impact of implementing offsetting?
- 6.28 Would at least 10% of the housing requirement be met on sites no larger than one hectare (NPPF paragraph 69)?
- 6.29 Is there compelling evidence to make an allowance for windfall housing in the plan period as per NPPF paragraph 71? Is the windfall figure of 100 dwellings per annum from 2024/25 soundly based?
- 6.30 The submitted Plan seeks to establish and confirm a five-year supply in accordance with NPPF paragraph 74b) in terms of the deliverable supply factoring in a buffer of 10%. Is this approach justified for Crawley by evidence that shows there will be sufficient sites to ensure that a five-year supply (predicated on a 10% buffer) will be achieved?
- 6.31 Overall, would the submitted plan provide for a robust five-year supply of deliverable housing land on plan adoption (in 2024)? Is the figure of 5.5 years justified?
- 6.32 Overall, would the submitted plan identify a developable supply in years 6-10 that would likely maintain continuity of supply as part of ensuring a plan-led system?

Matter 7: Crawley Town Centre

Issue 1: Whether the plan's overall approach to town centre development is sound.

- 7.1 Is the plan's evidence for setting an impact threshold of 500 square metres, departing from the NPPF's (paragraph 90) default threshold of 2,500 square metres sufficiently robust?
- 7.2 Is the extent of the primary and secondary shopping frontages sufficiently defined, with appropriate uses, as part of a positive strategy for the future of the town centre in line with Framework Paragraph 86(b)?
- 7.3 In addition to the town centre key opportunity sites identified in TC3, what provisions are made for any other sites that may come forward during the plan period?
- 7.4 Have all opportunities been taken to ensure that the site capacity of the town centre key opportunity sites (and any other town centre redevelopment) will be maximised?
- 7.5 Does the plan sufficiently cater for a 'town centre first' approach, having regard to opportunities for permitted development changes of use both within and outside the town centre?

Issue 2: Individual town centre sites

- 7.6 With regard to any potential development of Crawley Station and surrounding car parks, is the provision of alternative or replacement parking necessary? Should the Infrastructure Plan support any improvement of the station and Brighton Road level crossing that may be required as a result of an increase in usage deriving from town centre development?
- 7.7 Is it necessary for the Crawley College site to be masterplanned as a whole?

Matter 8: Character, design, and heritage

Issue 1: Whether the plan's approach to character, landscape and form of development is sound.

- 8.1 Are the proposed density ranges set out in Policy CL4 sound? Are they the most appropriate method in achieving a balance between optimising site capacity and respecting the character of surrounding areas? How will considerations such as parking and open space provision be included within density calculations?
- 8.2 Would the requirements of Policies CL2 and CL3 be onerous for smaller-scale developments? To what degree do the Council's 2009 Area Character Assessments remain relevant?
- 8.3 Does Policy CL8 require specific provision for connectivity between new and existing communities, including active travel links? Should there be a presumption against development affecting identified sites of wildlife importance, and the High Weald AONB, and is there sufficient protection for such sites? Are there areas of the Upper Mole Farmlands Rural Fringe (on the Manor Royal boundary) urbanised to such a degree that there would be conflict with this policy? How does this policy take account of the proposed Western Multi-Modal Transport link? Are criteria i and iv of this policy in conflict?
- 8.4 What requirements are there of development within long distance views (other than foreground development) to take account of their features or importance?
- 8.5 Given the intended densities of redevelopment sites, is a specific tall buildings policy required?
- 8.6 Is Policy CL5 required for soundness, or does this policy replicate others in the plan?
- 8.7 Is there unnecessary replication between the Nationally Described Space Standard and Policy DD3? Is the approach proposed consistent with PPG paragraph 56-018-20150327? Does this policy ensure the most efficient use of town-centre sites?
- 8.8 Policies refer include terms such as "developments of significant scale" and achieving a "good standard", or refer to "important" or "(in)appropriate" features. Are more specific definitions required?

Issue 2: Whether the plan's approach to water neutrality and water stress is sound.

- 8.9 Is the proposed standard of water use in residential development of 85 litres/per person/per day justified and effective? Is the requirement viable in combination with the other policy requirements of the plan?
- 8.10 The 85 l/p/d standard is a tighter efficiency standard than that contemplated in the optional technical standards in the PPG (para 56-013-20150327). Is this standard the only realistic and reasonable solution to the water neutrality issue in the Sussex North Water Resource Zone? Have other options (standards) been assessed as part of the SA/SEA process?
- 8.11 Is it viable for industrial / commercial development to deliver a score of 3 credits within the water category of BREEAM in combination with mitigatory offsetting?
- 8.12 Is it justified that the onus in the short to medium term (to c.2030) is on the development industry rather than the water utility company to demonstrate / achieve water neutrality?
- 8.13 Noting that the Water Neutrality Part C Study cautions that offsetting must be in place before water demand is generated, when will the proposed offsetting scheme be operational and is this appropriately reflected in the housing delivery trajectory and employment trajectory? Is there any further update on the delivery plan outlined at Appendix 1 to the Water Neutrality Progress Update (DS.TP.00b)?
- 8.14 Is it that only development located within the Sussex North Water Resource Zone as shown on the Policies Map should provide details for offsetting? Do criteria 4 and 5 of Policy SDC4 apply to all development proposals and should criterion 4 come before criterion 5?
- 8.15 Is it necessary for soundness for Policy SDC4 to require offsetting to be in place prior to occupation of dwellings and commercial premises as set out in the Sussex North Water Neutrality Study Part C Mitigation Strategy Final Report, November 2022? Are the proposed amendments to paragraph 15.45 and Policy SDC4 presented in document CBLP07 sufficient to address the issue of timing of offsetting?
- 8.16 Is it necessary for soundness to amend criterion 4 of Policy SDC4 to say there should be certainty that alternative water supplies can be secured?
- 8.17 Various modifications are proposed to Policy SDC4 in document CBLP07. Are these changes necessary for plan soundness?

Issue 3: Whether the plan's approach to heritage matters is sound.

- 8.18 Is the approach to Areas of Special Local Character justified, and are they sufficiently different from statutory conservation areas to warrant their inclusion in the plan?
- 8.19 Is the level of protection afforded by the plan to Locally Listed Buildings appropriate?

Matter 9: Environment and Green Infrastructure

Issue 1: Whether the approach to Environmental Protection is justified, effective and consistent with national policy.

- 9.1 Is the update to the Strategic Flood Risk Assessment likely to have any soundness implications for Policy EP1 on Development and Flood Risk?
- 9.2 Is the policy justified in restricting development sensitive to aviation transport noise to the 60dB contour (57db at night)? What has informed the change in thresholds since the 2015 Plan and does Topic Paper 7 provide a cogent explanation?
- 9.3 Would the policy potentially inhibit otherwise sustainable locations for residential development in the Borough?
- 9.4 Have alternative thresholds for aviation transport sources been tested including: (i) the scope for allowing development within a specified higher dB range subject to demonstrating effective mitigation that would reduce noise levels to acceptable readings in habitable areas; and (ii) not having a dB threshold in Policy and so assessing each proposal on its own merits subject to the acoustic evidence and mitigation provided?
- 9.5 Is Policy EP6 justified and effective in relation impact of external lighting on highway safety? Are the proposed changes in document CBLP07 necessary for plan soundness?

Issue 2: Whether the approach to recreational space provision is sound.

- 9.6 Would there be appropriate provision for recreation, including reserved space for Oakwood Football Club?

Matter 10: Transport and Infrastructure

Issue 1: Whether the approach to transport infrastructure to support the plan's proposals is soundly based.

- 10.1 Is it necessary for soundness that the submitted Plan content be amended to reflect the recent DfT Circular 01/22 in terms of ensuring transport demand on the strategic road network is minimised through positive visioning for development sites and interventions to support modal shift? Reference was made on submission to undertaking a checklist exercise in respect of Circular 01/22, is that likely to indicate any potential main modifications?
- 10.2 Is the Infrastructure Plan sufficiently clear and effective on likely mitigation required to the strategic road network (M23 and A23) as a consequence of the proposals and policies in the Plan over the period to 2040?
- 10.3 Does the fact the Crawley Transport Modelling Study is to 2035, whereas the plan period is 2040, indicate a level of uncertainty about impacts on transport infrastructure in the latter part of the plan period? Does the additional sensitivity testing to 2040 demonstrate that highway impacts attributable to the plan's policies and proposals have been appropriately considered over the totality of the plan period and a robust baseline (worst case scenario) established from which to develop mitigation approaches?
- 10.4 In terms of mitigating impacts attributable to the Crawley Borough Local Plan's policies and proposals, are these identified and would they largely be implemented through developer funding?
- 10.5 Are assumed reductions in vehicular trips in the transport modelling reasonable and realistic? What is the evidence for sustainable transport interventions being delivered in the plan period? What will be delivered in the Borough to facilitate modal shift as a consequence of the Local Cycle and Walking Infrastructure Plan and the Crawley Area Transport Strategy within the West Sussex Transport Plan 2022?
- 10.6 What evidence is there to suggest that local energy infrastructure will support the levels of electric vehicle charging set out in Policy ST1?
- 10.7 Does the plan make sufficient provision in Policy ST2 and its Parking Standards Annex to provide lesser amounts of vehicle parking in mixed-use developments, or higher-density housing development, in favour of other modes of transport?

Issue 2: Whether the plan's approach to the Crawley Western Multi-Modal Transport Link at Policy ST4 is sound?

- 10.8 Is the principle of an area of search justified? Is it necessary for plan soundness, having regard to the evidence base (documents at ES/ST/02 - the various SYSTRA reports), that a narrower area of search or preferred option for the route alignment is identified?
- 10.9 Is the area of search justified having regard to Gatwick Airport's masterplan, land ownerships, environmental designations and features and residential amenity? Is the interim approach to the eastern end of the route a pragmatic solution that would enable a future potential southern runway or an ineffective, costly and unjustified complexity that would present a significant level of risk to delivering a western link?
- 10.10 Would a route within the area of search be deliverable in principle and would Policy ST4 be effective in securing its delivery?
- 10.11 Does the proposed route safeguarding provide an effective approach that strikes an appropriate balance between not precluding strategic options 'At Crawley' coming forward whilst at the same time providing sufficient certainty as to what could occur within this part of the Borough?
- 10.12 Would it be necessary for soundness to extend the area of search for the link further east to Gatwick Road?
- 10.13 Is the wording of Policy ST4 sufficiently robust to ensure any route and its design takes account of environmental assets including, but not limited to, ancient trees/woodland not yet identified in any recognised inventory and proximate protected sites such as Local Green Space, Local Wildlife Sites and Local Nature Reserves?
- 10.14 Is it necessary for soundness for Policy ST4 to require a multi-modal link west of Crawley to have regard to land safeguarded at Gatwick Airport at part a of the policy?

Issue 3: Whether there is sufficient infrastructure capacity or scope for planned improvements to support the plan's proposals and secure sustainable growth.

- 10.15 With reference to the Infrastructure Plan (Document KD.IP.01), is the Plan based on a sound assessment of existing infrastructure capacity and future infrastructure requirements to ensure the plan's growth would be sustainable?
- 10.16 Are there any key inter-dependencies between infrastructure issues and the development trajectories in the plan?

- 10.17 In particular, does the housing trajectory take account of the impact of water neutrality in the short term prior to any updated Water Resources Management Plan and water utilities business plan for the period beyond 2025 and at the other end of the spectrum the potential need for upgrades to waste water treatment in the latter part of the plan period?
- 10.18 The evidence indicates that Crawley Waste Water Treatment Works (WWTW) are likely to reach capacity during the middle of the plan period and be subject to further permitting likely to require a tighter consent. Does the Plan provide a positive policy framework to enable additional / expanded waste water treatment facilities to be provided? Is there evidence that land needs to be allocated for waste water infrastructure to support the growth identified in the Plan?
- 10.19 For secondary education is it still the case that 4-6 additional forms of entry are required to support the housing growth in the Plan? Have there been any reasonable options to positively allocate land, including expanding existing sites to accommodate this requirement? Is there now some reliance on sites close to Crawley in neighbouring authorities to provide for Crawley's secondary education needs? Is there a reasonable prospect of existing sites in Crawley being able to cater for additional places through permanent or temporary expansion?
- 10.20 What is the situation with Special Education Needs (SEN) over the plan period? The Infrastructure Plan refers to a combination of provision, including a new special school. Are there reasonable options within the Borough to accommodate this need or is this another matter that may need to be addressed through potential sites close to Crawley?
- 10.21 Is the Infrastructure Plan sufficiently clear on highway mitigation in terms of the projects required over the plan period to ensure the potential impacts on the road network arising from the plan's policies and proposals can be addressed? Is there clarity in respect of identified highways projects as to who will lead on their delivery, what they will cost and potential sources of funding?
- 10.22 Will highway mitigation schemes essential to the Local Plan be implemented in a timeframe that aligns with the submitted development trajectories? How far does the Crawley Area Transport Package go in terms of funding transport improvements that would support the Plan's strategy and proposals?
- 10.23 How will the highway works to Ifield Roundabout and M23 Junctions 10 and 11 slip roads as identified in the Transport Study be funded? Is there a timeframe for their delivery? Is there any initial, in-principle understanding, proportionate to plan-making, that these interventions would be deliverable? When are they needed within the plan period?

- 10.24 Is there a programme of works, including schemes identified in the Local Cycling and Walking Infrastructure Plan (LCWIP) to secure early progression of sustainable measures for modal shift which if implemented would significantly reduce the need for physical changes to the highway network?
- 10.25 In light of the statements of common ground with National Highways and West Sussex County Council, will the Infrastructure Plan be updated during the course of this examination?
- 10.26 Is Policy IN2 a sound approach to securing infrastructure delivery through contributions from development where mitigation is required?
- 10.27 Is the Planning Obligations Annex a justified approach and consistent with national policy, including by reference to PPG paragraph 23b-004-20190901?
- 10.28 PPG also states that developers may be asked to provide contributions for infrastructure in several ways (Paragraph: 003 Reference ID: 23b-003-20190901), implying that there should be flexibility in how that is achieved, such as through planning obligations or contributions under CIL. Would it be necessary for plan soundness to add some flexibility in the Annex?

Issue 4: Plan-wide Viability

- 10.29 Taking account of the evidence in the Plan Viability Assessment 2021 and the 2022 Update (documents DS.VA.02a and 01a), would the requirements of the policies of the Plan put the viability of its implementation at serious risk?
- 10.30 Has the Plan Viability Assessment been subject to consultation / stakeholder engagement to 'sense check' the assumptions and approach used?
- 10.31 Does the evidence in the viability assessment show that, in line with NPPF paragraph 57, the policies in the Plan are viable taking account of affordable housing contributions, the current CIL as indexed (and its potential for future review) and likely site-specific planning obligations and so significantly reducing the need for costly and potentially protracted individual development appraisals at the planning application stage?
- 10.32 Does the viability evidence justify the significant affordable housing policy differential in Policy H5 between the town centre and the rest of the Borough?

10.33 Does the viability assessment align with the evidence in the Water Neutrality Study on the likely cost of mitigation including the details of the required offsetting scheme?

Matter 11: Monitoring and Implementation

11.1 Does the Plan contain an adequate framework for monitoring the implementation of its policies?