

# **CRAWLEY BOROUGH COUNCIL LOCAL PLAN REVIEW**

## **Crawley 2021 – 2037: Draft Duty to Cooperate Statement**

**March 2021**



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- v. Statement of Common Ground between Crawley and Mole Valley (January 2021)
- vi. Statement of Common Ground between Tandridge and Crawley (December 2018)
- vii. Ashdown Forest Statement of Common Ground (April 2018)

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## 1. Background

### 1.1 Purpose

- 1.1.1 The Duty to Cooperate establishes a need to plan for cross-boundary strategic issues and places a requirement on planning authorities to work together on such issues. The Duty applies to all local planning authorities, national park authorities and county councils in England, and to a number of other public bodies. The Prescribed Bodies relevant to strategic planning for Crawley are listed in Appendix A.
- 1.1.2 The NPPF provides further guidance on meeting the Duty to Cooperate in plan-making. Effective and on-going joint working should be demonstrated through the preparation and maintenance of Statements of Common Ground.
- 1.1.3 Effective cooperation with neighbouring authorities is critical for Crawley because of its primary economic role at the heart of the sub-region and the wider economic and environmental implications relating to Gatwick Airport.
- 1.1.4 Equally cooperation is essential, as due to its compact size, tight borough boundary around the existing urban area, significant physical constraints such as flooding and Area of Outstanding Natural Beauty, and restrictions due to airport noise and possible future airport expansion, Crawley cannot meet the housing needs of its growing population within its own boundaries in full.
- 1.1.5 This Duty to Cooperate Statement documents the approach the council has taken in meeting the Duty and demonstrates its effective and on-going joint working as part of the Local Plan Review.

### 1.2 Framework for Cooperation

- 1.2.1 The framework within which cooperation takes place has evolved over the period prior to, during and since the adoption of the existing Local Plan and continues to evolve throughout the Local Plan Review to reflect the particular issues which Crawley Borough Council (CBC) and neighbouring authorities face. References to the different components of this framework and the way they have contributed to the cooperation between CBC and other bodies are included in the main body of this Duty to Cooperate Statement.
- 1.2.2 The following table sets out the main groups and mechanisms in which CBC is an active member in securing a framework in which to address strategic needs and achieve cooperation. Maps indicating the different geographic areas are provided in Appendix B and details of meetings and outcomes from the key cross-boundary strategic groups are set out in Appendix C.

**Table 1.1: Framework for Cooperation**

Group	Scope	Members
<b>Coast to Capital Local Enterprise Partnership</b>	This is a network of functional economic hubs, with Gatwick Airport (in the centre of the area) and Brighton and Hove (in the south of the area) identified as key drivers of economic activity.	Business-led partnership between local authorities and businesses, across the geographic area from East Surrey in the north to Brighton in the south and west to Chichester.
<b>Gatwick Diamond Local Authorities</b>	Gatwick Diamond Initiative was established in 2003 as a business-led private/public sector partnership. The Gatwick Diamond Local Authorities continue to meet separately from the Initiative as part of discussing cross-boundary and strategic issues.	Epsom & Ewell District Council Crawley Borough Council Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate & Banstead Borough Council Surrey County Council Tandridge District Council

Group	Scope	Members
<p><b>West Sussex and Greater Brighton</b></p>	<p>There are a number of very well established West Sussex county wide groupings, as well as groups which include Greater Brighton. Of particular relevance to the Local Plan has been:</p> <ul style="list-style-type: none"> <li>• Leaders and Chief Executives of West Sussex County Council and District and Borough Councils.</li> <li>• Greater Brighton Economic Board.</li> <li>• West Sussex and Greater Brighton Strategic Planning Board – consists of Cabinet members responsible for planning and senior officers, and acts as a political forum to discuss issues relating to Duty to Cooperate and other joint planning issues.</li> <li>• West Sussex and Greater Brighton Planning Officers Group – support the work of the Strategic Planning Board and the agenda reflects that of the member group.</li> <li>• Planning Policy Officers Group – shares good practice and updates on Planning Policy preparation.</li> </ul>	<p>Adur &amp; Worthing Councils Arun District Council Brighton &amp; Hove City Council Chichester District Council Crawley Borough Council East Sussex County Council Horsham District Council Lewes &amp; Eastbourne Councils Mid Sussex District Council South Downs National Park Authority West Sussex County Council</p>
<p><b>Northern West Sussex Authorities</b></p>	<p>There is a long history of joint working between the three Local Authorities located in the Strategic Housing Market Area which has been identified as covering the northern half of West Sussex.</p> <p>Meetings and discussions have taken place between Leaders, Chief Executives, Portfolio Holders, Chief Planning Officers and Planning Officers. These include the involvement of West Sussex County Council in its critical infrastructure and countywide planning role.</p> <p>A number of joint evidence studies have been commissioned and updated over a number of years, including: Strategic Housing Market Area Assessment and its updates and Economic Growth Assessment.</p>	<p>Crawley Borough Council Horsham District Council Mid Sussex District Council West Sussex County Council</p>
<p><b>High Weald AONB Partnership</b></p>	<p>A partnership which seeks to conserve and enhance the natural beauty of the High Weald Area of Outstanding Natural Beauty. Prepares and maintains the High Weald Management Plan.</p>	<p>Ashford Borough Council Crawley Borough Council East Sussex County Council Hastings Borough Council Horsham District Council Kent County Council Mid Sussex District Council</p>

Group	Scope	Members
		Rother District Council Sevenoaks District Council Surrey County Council Tandridge District Council Tonbridge & Malling Borough Council Tunbridge Wells Borough Council Wealden District Council West Sussex District Council Natural England
<b>Groupings established to address specific issues</b>	These include: <ul style="list-style-type: none"> <li>• Gatwick Joint Local Authorities</li> </ul>	Crawley Borough Council East Sussex County Council Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate & Banstead Borough Council Surrey County Council Tandridge District Council West Sussex County Council (Gatwick Airport Limited)
	<ul style="list-style-type: none"> <li>• Ashdown Forest Working Group;</li> </ul>	Brighton & Hove City Council Eastbourne Borough Council East Sussex County Council Crawley Borough Council Hastings Borough Council Lewes District Council Mid Sussex District Council Rother District Council South Downs National Park Authority Tandridge District Council Tonbridge & Malling Borough Council Tunbridge Wells Borough Council Sevenoaks District Council Wealden District Council West Sussex County Council Natural England
	<ul style="list-style-type: none"> <li>• Upper Mole Group &amp; Gatwick Water Cycle Study authorities;</li> </ul>	Crawley Borough Council Horsham District Council Mid Sussex District Council Reigate & Banstead Borough Council
	<ul style="list-style-type: none"> <li>• Sussex North Water Resource Zone;</li> </ul>	Chichester District Council Crawley Borough Council Horsham District Council South Downs National Park Authority Arun District Council Mid Sussex District Council

Group	Scope	Members
		Environment Agency Natural England Southern Water
	<ul style="list-style-type: none"> <li>Arun Valley Rail Station group;</li> </ul>	Crawley Borough Council Horsham District Council West Sussex County Council Network Rail Department for Transport GTR Coast to Capital LEP
	<ul style="list-style-type: none"> <li>West of Crawley strategic sites;</li> </ul>	Crawley Borough Council Horsham District Council West Sussex County Council Homes England
	<ul style="list-style-type: none"> <li>Gatwick Greenspace partnership.</li> </ul>	Crawley Borough Council Horsham District Council Mole Valley District Council Reigate & Banstead Borough Council Surrey County Council West Sussex County Council Horley Town Council Sussex Wildlife Trust Gatwick Airport Limited
<b>One-to-One discussions with other local authorities, prescribed bodies and other infrastructure providers</b>	As required.	Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate & Banstead Borough Council Tandridge District Council West Sussex County Council Natural England Highways England Thames Water Southern Water SES Water South East Water Metrobus

1.3 Adopted Crawley Borough Local Plan 2015 – 2030

1.3.1 The Crawley Borough Local Plan was adopted in December 2015 having been found legally compliant and sound by an independent Planning Inspector following its examination. This included meeting the legal and soundness tests of Duty to Cooperate<sup>1</sup>. In particular, the Inspector noted that:

*“Ultimately, Crawley is reliant on others if its needs are to be met in full. As Planning Practice Guidance (PPG) makes clear, the duty to cooperate is not a duty to agree: the decision on whether to accommodate Crawley’s unmet need is for neighbouring authorities to make, having regard to the policies of the NPPF and their own particular circumstances. The evidence shows that Crawley has been persistent in*

<sup>1</sup> Report on the Examination into Crawley Borough Local Plan 2015 – 2030, paragraphs 6 – 11, 34, 82, and 115-116 (November 2015)

identifying the scale of its unmet needs and in asking neighbouring authorities to make appropriate provision...” (paragraph 10), and

“Overall Crawley has adopted a process of continuous engagement with neighbouring authorities in seeking to meet its strategic needs. Whilst it has not yet been able to secure in full the future provision of its unmet needs, there is no compelling evidence that such failure has resulted from the Council not promoting its case with sufficient vigour...” (paragraph 11).

1.3.2 The Plan was supported, in its preparation and examination, by a Duty to Cooperate Statement which set out the areas of cross-boundary and strategic importance, and the work done in order to address these across administrative boundaries. These key areas were found to be:

- Meeting Housing Needs
- Gypsy, Travellers and Travelling Showpeople
- Economic Growth
- Gatwick Airport
- Key Transport Routes
- Flooding and Flood Risk
- Climate Change and Low Carbon Economy
- Broadband Infrastructure
- Green Infrastructure
- Water and Wastewater Infrastructure

1.3.3 The Local Plan was found sound despite it not being possible for the borough’s full development needs to be accommodated within Crawley’s administrative boundaries. Table 1.2 below sets out the planned growth associated with the adopted Plan, and the remaining unmet need, within the context of Crawley’s overall objectively assessed need for the Plan period 2015 to 2030.

**Table 1.2: Crawley Development Needs 2015 – 2030**

	Total Objectively Assessed Need over the Plan period (2015 – 2030)	Local Plan Development Requirement	Unmet Need Remaining
Housing	10,125 dwellings	5,100 dwellings	5,000 dwellings
Employment (B-Use)	58 hectares	23 hectares	35 hectares

1.3.4 In order to provide clearer indication of how the council intended to address the unmet need, a modification was made to the Plan to insert the following additional wording into Policy H1: Housing Provision:

*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.*

1.3.5 In relation to employment, severe constraints on the availability of developable land in Crawley meant that even the borough’s baseline B-class employment needs could not be met. The Local Plan Inspector accepted that the approach with meeting employment needs differed from meeting the borough’s housing needs, confirming that:

*“...I do not accept the argument that the council should be more active at this stage in engaging with other authorities to seek provision of employment sites outside the borough. If Gatwick remains a single runway airport and safeguarding is lifted, the*

*available land to the south and/or east of the airport is best placed to meet the medium and longer term employment needs of the borough and the wider Gatwick Diamond. This is different to the housing situation, where the amount of land suitable for new homes would not meet the identified needs even if safeguarded is lifted. Clearly the council may have to look to its neighbours to satisfy its employment needs if Gatwick gets a second runway or safeguarding is not lifted, but that is a matter for the review of the Plan following the government's decision.*

The Inspector also endorsed the Plan's strategy of protecting and maximising the use of existing employment sites, subject to modified wording that would also support delivery of new employment land as extensions to Manor Royal on land outside of safeguarding.

#### 1.4 Progress since 2015

- 1.4.1 The council's continual Duty to Cooperate is monitored and key progress is summarised annually in the Authority's Monitoring Reports<sup>2</sup>. AMR extracts are combined in Appendix D to outline the key Duty to Cooperate Milestones between 2016 and 2021.

#### *Meeting Crawley's Unmet Housing Needs:*

- 1.4.2 As part of the examinations into the other Local Plans for the Housing Market Area, CBC secured commitments through which the unmet need of Crawley has been accounted for, thereby ensuring Crawley's 2015-2030 anticipated housing need will be accommodated in full within the Northern West Sussex (NWS) Housing Market Area (HMA):
- Reigate and Banstead Core Strategy, paragraphs 7.4.1 – 7.4.4 (2013) Reigate and Banstead Borough Council<sup>3</sup>;
  - Horsham District Planning Framework, paragraph 6.3 (2015) Horsham District Council<sup>4</sup>;
  - Mid Sussex District Plan 2014 – 2031, Policy DP4: Housing and Policy DP5: Planning to Meet Future Housing Need (2018) Mid Sussex District Council<sup>5</sup>.
- 1.4.3 The Planning Inspector for the Horsham District Planning Framework concluded Horsham should try to accommodate roughly half of Crawley's unmet needs<sup>6</sup>. In assessing the overlap between the NWS HMA and that of the coastal authorities to the south and London to the north, he remained unconvinced of any considerable degree of overlap<sup>7</sup> and therefore concluded that there were no additional needs arising from these authorities to be met by the Horsham District Plan.
- 1.4.4 The Planning Inspector for the Mid Sussex District Plan provides a detailed summary of the most up-to-date position in relation to meeting the needs of the Housing Market Area, including Coastal West Sussex and Brighton, Surrey and London, and

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<sup>2</sup> [Crawley Borough Local Plan Authority's Monitoring Report 2017/18](#) (Part 7, pages 36-37; and Appendix G, pages 64-68); [Crawley Borough Local Plan Authority's Monitoring Report 2016/17](#) (Part 7, pages 40-41; and Appendix G, pages 65-68); [Crawley Borough Local Plan Authority's Monitoring Report 2015/16](#) (Part 6, pages 28-29; and Appendix E, pages 42-43); [Crawley Borough Local Plan Authority's Monitoring Report 2013/15](#) (Part 5, pages 16-17; and Appendix C, pages 23-30); [LDF Annual Monitoring Report 2012/13](#) (Part 5, pages 60-61; and Appendix F, pages 80-85)

<sup>3</sup> [http://www.reigate-banstead.gov.uk/download/downloads/id/3073/adopted\\_core\\_strategy\\_july\\_2014.pdf](http://www.reigate-banstead.gov.uk/download/downloads/id/3073/adopted_core_strategy_july_2014.pdf)

<sup>4</sup> [https://www.horsham.gov.uk/\\_data/assets/pdf\\_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf](https://www.horsham.gov.uk/_data/assets/pdf_file/0016/60190/Horsham-District-Planning-Framework-November-2015.pdf)

<sup>5</sup> <https://www.midsussex.gov.uk/media/3406/mid-sussex-district-plan.pdf>

<sup>6</sup> Report on the Examination into Horsham District Planning Framework, paragraphs 40 and 43 (8 October 2015) Geoff Salter

<sup>7</sup> Report on the Examination into Horsham District Planning Framework, paragraphs 41 and 42 (8 October 2015) Geoff Salter

concluded that the first priority should be the unmet need arising in the same HMA as Mid Sussex<sup>8</sup> (i.e. the Northern West Sussex HMA).

- 1.4.5 Table 1.3 below sets out the three authorities' respective adopted Local Plan housing requirements against the adopted objectively assessed housing needs. The table shows that the Northern West Sussex Housing Market Area is close to meeting its own objectively assessed housing needs in full for the adopted Plan periods. Against the annual Plan figure there is a shortfall of 97dpa, but when this is considered over full anticipated delivery across the Plan periods, due to the different lengths involved<sup>9</sup>, it results in a total outstanding amount of 527 dwellings, which equates to 35dpa.

**Table 1.3: Northern West Sussex adopted Local Plan Housing Needs and Housing Provision**

	Mid Sussex (Plan Period: 2014 – 2031)	Crawley (Plan Period: 2015 – 2030)	Horsham (Plan Period: 2011 – 2031)	TOTAL
Annual Adopted Plan OAN	876dpa	675dpa	650dpa	<b>2,201dpa</b>
Full Adopted Plan OAN	14,892 dwellings	10,125 dwellings	13,000 dwellings	<b>38,017 dwellings</b>
Annual Adopted Plan Figure	876dpa (14/24) 1,090dpa (24/31) Ave: 964dpa	340dpa	800dpa	<b>2,104dpa</b>
Full Adopted Plan Figure	16,390 dwellings	5,100 dwellings	16,000 dwellings	<b>37,490 dwellings</b>

- 1.4.6 It was recognised through the Mid Sussex District Plan examination that this outstanding amount could be monitored against potential over-delivery in any of the three authority areas. As it is anticipated a shortfall would occur only in the latter part of the Plan period, this would be addressed through the District and Local Plan reviews. Table 1.4 shows how this is currently being anticipated as being addressed through planned over-delivery within Crawley's borough boundaries.

**Table 1.4: Meeting Crawley's Total Objectively Assessed Housing Needs 2015 – 2030**

	Dwellings	
	Local Plan Provision	Crawley AMR Provision
<b>OAN for period 2015 – 2030</b>	<b>10,125</b>	<b>10,125</b>
Crawley Local Plan 2015 – 2030	5,100	
Projected Provision in Crawley AMR 2015 – 2030 <sup>10</sup>		6,628
Contribution from Mid Sussex District Plan	1,498	1,498
Contribution from Horsham Planning Policy Framework	3,000	3,000
<b>Totals</b>	<b>9,598</b>	<b>11,126</b>
Shortfall/Surplus against OAN 2015 – 2030	<b>-527</b>	<b>+1,001</b>

- 1.4.7 Through the examination processes, the timetables for delivery across the housing market area were considered and resulted in complementary housing trajectories

<sup>8</sup> Report on the Examination of the Mid Sussex District Plan 2014-2031, paragraphs 21 – 28 (12 March 2018)  
Jonathan Bore [Inspector's Report on the District Plan \(179kB PDF\)](#)

<sup>9</sup> Specific Plan Periods relate to: Crawley Local Plan 2015 – 2030 (the backlog immediately prior to 2015, 2012-2015, is included in the projection over the Plan period); Horsham District Planning Framework 2011 – 2031; Mid Sussex District Plan 2014 - 2031

<sup>10</sup> Crawley Borough Local Plan Authority Monitoring Report 2018/19: Housing Trajectory, page 49: [Crawley Authority Monitoring Report 2018/19](#)

and allowed for stepped delivery: for Crawley, the frontloading of housing delivery and, for Mid Sussex, the ‘stepping up’ of delivery after the first ten years of the District Plan (see Appendix E).

- 1.4.8 Each of the authorities have a five year land supply of housing<sup>11</sup>, and met the 2018 Housing Delivery Test (Crawley: 181%; Horsham: 141%; Mid Sussex: 110%)<sup>12</sup>, with Crawley continuing to exceed the Housing Delivery Test in 2019<sup>13</sup> and 2020<sup>14</sup> at 235% and 252% respectively<sup>15</sup>.
- 1.4.9 On this basis, it is established that the full housing need across the housing market area is currently being met, and Crawley’s unmet need figure has been accounted for within the adopted Local Plans for Mid Sussex and Horsham districts.

*Meeting Crawley’s Unmet Employment Needs:*

- 1.4.10 The government accepted the conclusions of the Airports Commission work and published the Airports National Policy Statement supporting a new runway at Heathrow in June 2018. However, this was legally challenged and uncertainty remained over the requirement for continued safeguarding at Gatwick so there has been no opportunity to review this until the current Local Plan Review.
- 1.4.11 In 2019, Reigate and Banstead Borough Council adopted their Development Management Plan, which allocated the site at Land west of Balcombe Road, Horley as a Strategic Business Park. This 31ha site is anticipated to provide approximately 200,000sqm employment floorspace, predominantly B1a, with limited B1b, B1c, B8 and non-B Classes including appropriate airport-related Sui Generis, uses. Whilst the site will contribute to the employment needs of Reigate and Banstead, the site’s prime function is to provide jobs for the wider Gatwick Diamond economic sub region and to assist in providing around 75% of the office floorspace shortfall from Crawley’s 2015 Local Plan<sup>16</sup>.

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<sup>11</sup> Horsham Authority Monitoring Report 2019/20: <https://www.horsham.gov.uk/planning/planning-policy/authority-monitoring-report> and Mid Sussex Housing Land Supply July 2019: <https://www.midsussex.gov.uk/planning-building/consultation-monitoring/>

<sup>12</sup> Housing Delivery Test: 2018 measurement (2019) MHCLG  
<https://www.gov.uk/government/publications/housing-delivery-test-2018-measurement>

<sup>13</sup> Housing Delivery Test 2019 measurement (2020) MHCLG  
<https://www.gov.uk/government/publications/housing-delivery-test-2019-measurement>

<sup>14</sup> Housing Delivery Test 2020 measurement (2021) MHCLG  
<https://www.gov.uk/government/publications/housing-delivery-test-2020-measurement>

<sup>15</sup> Horsham Housing Delivery Test Results: 2019 – 148%; 2020 – 155%; Mid Sussex Housing Delivery Test Results: 2019 – 95%; 2020 – 91%

<sup>16</sup> Northern West Sussex Economic Growth Assessment, para. 10.52 (2020) Lichfields: [Northern West Sussex Economic Growth Assessment](#)

## 2. Crawley Local Plan Review

### 2.1 Crawley Local Plan Review Context:

2.1.1 Following the publication of the government’s consultation draft of the National Planning Policy Framework and accompanying practice guidance which provided greater guidance in relation to the maintenance of an up-to-date plan and the five-year review process, the council began the review of the Local Plan in August 2018.

2.1.2 The Local Plan Review is not starting from a blank page. In many cases, the principles and policies of the adopted Crawley Borough Local Plan 2015 remain up-to-date and ‘sound’. Therefore, for some topic areas, progress is well advanced and there may be little change proposed to the current approach. For other areas, the review has provided the opportunities for proposing a change or a new approach to be considered.

2.1.3 The draft Local Plan Review identifies the following cross-boundary strategic issues relating to the future development of Crawley over the Local Plan period<sup>17</sup>:

- Meeting housing needs
- Economic growth
- Gatwick Airport
- Gypsy, Travellers and Travelling Showpeople
- Key transport routes
- High quality communications connectivity
- Low carbon economy
- Water resources
- Flooding and flood risk.

Section 3 of this document identifies the key joint working and cooperation which has been undertaken to address each of these matters as part of this Local Plan Review. In relation to Low Carbon Economy and High Quality Communications Connectivity – these are picked up as part of Economic Growth. In addition to the issues set out in the list above, Green Infrastructure and biodiversity is also considered below in relation to meeting the Duty to Cooperate.

2.1.4 The Local Plan Review has been through the formal processes of Early Engagement and an initial stage of Publication Consultation, along with the other on-going work the council has continued in order to address the emerging issues as they have arisen. The timetable for the Local Plan is set out in Table 2.1 below, along with the Key Duty to Cooperate Milestones.

**Table 2.1: Local Plan Review Timetable & Key Duty to Cooperate Milestones**

Stage	Date
<b>Adopted Crawley Borough Local Plan</b>	<b>December 2015</b>
Gatwick Diamond Memorandum of Understanding Update	27 July 2016
Publication of Gatwick 360 Infrastructure Report	27 July 2016
Publication of Joint Housing Market Mix Study for Crawley and Horsham	7 December 2016
Publication of Joint Starter Homes Study for Crawley and Horsham	7 December 2016
Crawley join West Sussex and Greater Brighton Strategic Planning Board in ‘Observing’ role	14 April 2017
Gatwick Diamond Local Strategic Statement 2016 Update agreed	26 June 2017

<sup>17</sup> Crawley Borough Submission Draft Local Plan, para. 1.27 (January 2021) CBC

Crawley Borough Local Plan 2021 – 2037  
Draft Duty to Cooperate Statement, March 2021

Stage	Date
Crawley response to Mid Sussex draft Position Statement and proposed modifications	27 September 2017
Joint Submission of Bid to DCLG as part of West Sussex and Greater Brighton Strategic Planning Board to support LSS3	11 January 2018
Crawley join West Sussex and Greater Brighton Strategic Planning Board as Full Member	18 January 2018
Crawley response to Reigate and Banstead Development Management Plan Regulation 19 Consultation and Duty to Cooperate Statement	28 February 2018
Signed Ashdown Forest Statement of Common Ground	16 April 2018
Crawley response to Horsham Local Plan Review Issues and Options (Regulation 18 consultation: Employment, Tourism and Sustainable Rural Development)	1 June 2018
Publication of Gatwick 360 Strategic Economic Plan	23 July 2018
<b>Commenced Local Plan Review</b>	<b>August 2018</b>
Signed Statement of Common Ground between Crawley and Tandridge	10 December 2018
Adoption of High Weald AONB Management Plan	8 March 2019
Completion of Eco-Serv GIS Joint Report for Crawley and Horsham	March 2019
<b>Early Engagement consultation</b>	<b>15 July 2019 – 16 September 2019</b>
Publication of Joint Northern West Sussex Strategic Housing Market Assessment for Crawley and Horsham (and Mid Sussex)	29 November 2019
Signed PPA between Horsham, Crawley, West Sussex and Homes England	8 January 2020
<b>Initial Publication Consultation Commenced</b>	<b>20 January 2020</b>
Formal Letter to all Neighbouring Authorities to clarify Crawley Borough Level of Unmet Needs	21 January 2020
Publication of Joint Northern West Sussex Economic Growth Assessment for Crawley, Horsham and Mid Sussex	27 January 2020
<b>Initial Publication Consultation End</b>	<b>2 March 2020</b>
Signed West Sussex Statement of Common Ground	April 2020
Signed Statement of Common Ground between Mid Sussex and Crawley for the Mid Sussex Site Allocations Plan	6 May 2020
Signed Northern West Sussex Statement of Common Ground	2 June 2020
Publication of Joint Gatwick Water Cycle Study	28 August 2020
Publication of Joint Strategic Flood Risk Assessment for Crawley and Horsham	14 September 2020
<b>Publication Submission Consultation</b>	<b>6 January – 17 February 2021</b>
Publication of Draft Habitats Regulations Assessment	19 January 2021
Signed Statement of Common Ground between Crawley and Mole Valley	25 January 2021
Signed Statement of Common Ground between Crawley and Reigate and Banstead	5 February 2021

Stage	Date
Circulation of draft Crawley Duty to Cooperate Statement to Prescribed Bodies	25 February 2021
Draft Crawley Duty to Cooperate Statement Published for Consultation	31 March 2021
Signed Statement of Common Ground between Crawley and Horsham	TBC
Publication of Final Transport Modelling Study	TBC
Signed Statement of Common Ground between Crawley and West Sussex County Highways and Highways England	TBC
Publication of Final Habitats Regulations Assessment	TBC
<b>Submission</b>	<b>Summer 2021</b>
<b>Examination in Public (anticipated)</b>	<b>Autumn 2021</b>
<b>Adoption (anticipated)</b>	<b>July 2022</b>

## 2.2 Framework for Cooperation

2.2.1 As set out in Table 1.1, the strategic issues are being discussed beyond the borough's administrative boundaries in the following forms:

- Individual discussions on a one-to-one basis with neighbouring authorities.
- Meetings at a Northern West Sussex Authorities level, with Mid Sussex District Council, Horsham District Council and West Sussex District Council; and commissioning joint evidence base such as the Strategic Housing Market Assessment and the Economic Growth Assessment.
- Participating at a Gatwick Diamond level, with the Gatwick Diamond Authorities (crossing the County authority areas of West Sussex and Surrey). Jointly updating and signing up to the Gatwick Diamond Memorandum of Understanding and Local Strategic Statement, as well as being jointly involved as part of the Gatwick Diamond Local Authorities in responding and participating in the London Plan Examination in Public.
- Considering County-wide issues, through meeting with West Sussex and Greater Brighton Authorities at officer and member levels and participating in the preparations for a West Sussex and Greater Brighton Local Strategic Statement.
- Involvement on a river basin management level in preparing the Brief for updating Water Cycle Study and Water Neutrality Assessment evidence.
- Meeting as Gatwick Airport Joint Local Authorities at officer and member level to jointly consider the implication of current and future Gatwick Airport operations.
- Participating as a member of the Greater Brighton Economic Board.
- Participating as a member of the Ashdown Forest Working Group in relation to Habitats Regulations Requirements associated with the Ashdown Forest Special Area of Conservation. Joint signatories to the Ashdown Forest Statement of Common Ground.

The different strategic joint working mechanisms in place within which Crawley has undertaken the Duty to Cooperate are set out in Appendix C, and Appendix B provides maps illustrating the geographies of these.

2.2.2 Evidence to support the Local Plan has been carried out at a variety of levels, depending on the appropriate scale of the information required and issue being considered. Joint working on evidence studies has long been recognised as the most appropriate form in many cases. This includes:

- Northern West Sussex Strategic Housing Market Assessment;

- Northern West Sussex Economic Growth Assessment;
- Gatwick Water Cycle Study;
- Joint Strategic Flood Risk Assessment.

Details of the joint evidence studies are set out in Appendix F.

## 2.3 Crawley Local Plan Review: Updated Housing and Employment Needs

- 2.3.1 The national standardised Methodology has been applied in a Crawley-context as part of the Local Plan Review in order to establish the starting point for considering housing need. This has increased the housing need figure. The updated Economic Growth Assessment has reassessed the economic need for employment (particularly business) land. Table 2.2 sets out the changes in identified objectively assessed development needs from the adopted Local Plan.

**Table 2.2: Change in Objectively Assessed Development Needs for Crawley**

	Crawley 2030 Adopted Local Plan 2015 – 2030 (December 2015)	draft Submission Crawley Local Plan Review 2021 – 2037 (January 2021)
Housing Need (dwellings per annum)	675dpa	750dpa <sup>18</sup>
Housing Need (over the full Plan periods)	10,125 dwellings	12,000 dwellings <sup>19</sup>
Employment (Business) Land – Hectares	58ha	38.7ha

- 2.3.2 On 25 March 2021, the Office of National Statistics released updated Affordability Ratio figures for Local Authority areas. This is a key element of the national Standard Method for calculating housing need. Planning Practice Guidance confirms the local housing need figure should be kept under review and revised where appropriate, acknowledging that the inputs are variable, until the Local Plan is submitted to the Planning Inspectorate for examination. On this basis, the draft Submission Local Plan will be updated to reflect the revised Standard Method housing requirement prior to its submission, as a proposed necessary, and factual, Main Modification.
- 2.3.3 Alongside understanding the development needs of the borough, further work has been carried out to maximise the amount of development that can be accommodated within Crawley’s administrative boundaries, including seeking to maximise capacity by introducing high density targets for the Town Centre and accessible locations (Policy CL5) and a series of housing typology policies to positively influence development opportunities within the borough (Policies H3, and H3a-H3f). This has increased the anticipated minimum supply of housing from the Early Engagement stage of the Local Plan Review, of 4,806 net dwellings, to 5,320 net dwellings. However, due to the extended Plan period over 16 years and the reliance on windfalls towards the end of the Plan period, the annualised average is only marginally higher than anticipated at Regulation 18 consultation.
- 2.3.4 The extent of land required to be safeguarded for a potential future southern runway at Gatwick Airport has also been assessed, facilitating the identification of a Strategic Employment Location to meet Crawley’s employment land needs.
- 2.3.5 The conclusions of this work are set out in Table 2.3 below.

<sup>18</sup> Please note: due to the revised Affordability Ratios released by Office of National Statistics (25 March 2021), the Standard Method Housing Need for Crawley equals 718dpa

<sup>19</sup> This has reduced to 11,488 dwellings over the full Plan period: 2021 – 2037.

*Updated Unmet Housing and Employment Needs:*

**Table 2.3: Crawley Local Plan Review Anticipated Unmet Needs 2021 – 2037**

	Objectively Assessed Need	Submission Draft Crawley Local Plan Supply	Unmet Needs
Housing Need (dwellings per annum)	718dpa	332.5dpa	385.5dpa
Housing Need (2021 – 2037)	11,488 dwellings	5,320 dwellings	6,168 dwellings
Employment (Business) Land (2021 – 2037) in Hectares	37.8ha (of which: 32.8ha Industrial Land)	17.6ha on sites predominantly located within Main Employment Areas (of which 8.7ha is for Industrial Land) & 24.1ha Industrial Land through the allocation of a new Strategic Employment Site.	None

- 2.3.6 In addition to the overall housing need requirement, providing housing for specific groups within Crawley is challenging, including meeting affordable housing needs and those for self- and custom-build.
- 2.3.7 In January 2020, CBC formally wrote to all of the neighbouring authorities it considered it has some degree of a strategic planning relationship with, including those who do not share administrative boundaries, highlighting the anticipated level of unmet need arising over the Review Plan period. The levels of unmet need raised at that point reflected the evidence available for the initial period of Publication Consultation carried out between January and March 2020. Appendix H sets out this letter and details the authorities to which it was sent. Appendix I sets out the replies received in response to the formal letter. No authorities were in a position to confirm they could meet Crawley’s unmet housing needs, but MSDC and HDC confirmed they would continue to seek to address them as part of the HMA.
- 2.3.8 However, whilst this letter formalised the request and set out the January 2020 published figures for the draft Local Plan, at the initial Regulation 19 stage, this was sent out in the context of previous on-going discussions and within the existing understanding, as it is clear from the responses, of Crawley’s development needs and land supply constrained position. This understanding has developed through cross-boundary work on the adopted Local Plan, the joint evidence work being carried out across the Northern West Sussex Housing Market Area, detailed strategic site-specific discussions took place across administrative boundaries in relation to proposals “at Crawley” and within the framework of the updated Gatwick Diamond Local Strategic Statement. This progress is detailed further under each of the relevant Strategic Issues set out in Section 3 of this Statement.

*Unmet Infrastructure Needs:*

- 2.3.9 The Infrastructure Plan which accompanies the Local Plan has highlighted emerging infrastructure needs associated with the growth of the borough’s population which need addressing. Due to national changes affecting the provision of some types of infrastructure this has led to different outcomes that had been previously confirmed as part of the adopted Crawley Borough Local Plan 2015.

**Table 2.4: Crawley Local Plan Review Anticipated Unmet Infrastructure Needs**

	<b>Crawley 2030 Adopted Local Plan (December 2015): Infrastructure Plan (Nov 2014)</b>	<b>draft Submission Crawley Local Plan Review (January 2021): draft Infrastructure Plan (January 2021)</b>
<b>Secondary Education</b>	<p>Additional provision at both primary and secondary school level is required to cater for anticipated levels of growth. This would be met by:</p> <ul style="list-style-type: none"> <li>• Extending existing schools to create additional places;</li> <li>• Gatwick Green Free School in Manor Royal;</li> <li>• Provision of secondary places in the North of Horsham.</li> </ul>	<p>A site for a 6-8 FE secondary school is required: catering for 6-8 forms of entry (180-240 places per year group) of Secondary Education.</p>
<b>Special Education Needs</b>	<p>Not highlighted.</p>	<p>Additional specialist provision is required, through a combination of a new special school, Special Support Centres at existing schools and an alternative provision college site for children who are excluded from mainstream school.</p> <p>A particular shortfall in provision for children with Social, Emotional and Mental Health needs and for children with Autism.</p>
<b>Health: GP Provision</b>	<p>GP provision being met by new provision in:</p> <ul style="list-style-type: none"> <li>• Kilnwood Vale</li> <li>• Forge Wood</li> </ul> <p>There is a need for an expanded surgery in Bewbush and options are being discussed with the CCG, possibly linked to provision serving the new residents of Kilnwood Vale.</p>	<p>Existing issues with Primary Care premises which cannot meet the needs of the growing population. NHS England do not consider new provision at Kilnwood Vale and Forge Wood is feasible or necessary. Reorganisation into Primary Care Networks (PCNs) to increase resilience and enhance capacity.</p>
<b>Water Supply</b>	<p>Within an area of serious water stress: need to manage demand for water through water efficiency measures so these are vital.</p>	<p>Within an area of serious water stress and concerns regarding groundwater abstraction at Hardham highlighted through the HRA: need to manage demand for water through water efficiency measures so these are vital.</p>

	Crawley 2030 Adopted Local Plan (December 2015): Infrastructure Plan (Nov 2014)	draft Submission Crawley Local Plan Review (January 2021): draft Infrastructure Plan (January 2021)
Waste Water	<p>The requirement for an additional facility will be dependent on factors including housing forecasts and changes in technology for the treatment of waste water and trade flows.</p> <p>Housing growth being considered up to 2021 could be accommodated by the Crawley Waste Water Treatment Works.</p>	<p>The flow permit for Crawley Waste Water Treatment Works (WwTW) is likely to be exceeded towards the end of 2030 (near the end of the AMP8 period). Thames Water has confirmed that the Works is close to its treatment capacity, and will exceed its permit during the Local Plan period.</p> <p>A new permit from the Environment Agency is likely to require a tighter Ammonia, Biochemical Oxygen Demand (BOD) and suspended solids consent, likely requiring an upgrade to achieve.</p> <p>It will be important to ensure that growth is aligned with delivery of additional capacity at Crawley WwTW.</p>

*Other Key Strategic Matters:*

- 2.3.10 **Rail:** Since the adoption of the Crawley Borough Local Plan 2015, discussions have taken place with Horsham District Council, West Sussex County Council, Network Rail and the Department for Transport, along with GTR, Coast to Capital LEP, and the developers of strategic sites between Crawley and Horsham within Horsham district, regarding the potential delivery of new additional rail stations on the Arun Valley line between Crawley and Horsham.
- 2.3.11 **Strategic Housing Development:** Since the adoption of the Crawley Borough Local Plan 2015, discussions have taken place with Horsham District Council, West Sussex County Council and Homes England, regarding Homes England’s proposals for up to 10,000 new dwellings, and associated infrastructure and commercial provision, in three new neighbourhoods adjacent to Crawley, in the form of urban extensions to the town.
- 2.3.12 **Western Link Road:** Associated with the Homes England proposals, further discussions have taken place, along with emerging transport modelling evidence for both Horsham District Local Plan and the Crawley Borough Local Plan, relating to the potential need for a western link road between the A264 and the A23 (north of County Oak).
- 2.3.13 **Gatwick Airport:** Discussions have taken place with the Gatwick authorities regarding Gatwick Airport Limited’s Gatwick Airport Master Plan (published 2019), and, through the Development Consent Order process, its proposals for the use of the existing emergency runway to the north of the main runway.
- 2.3.14 **Strategic Employment Provision:** Since the adoption of the Crawley Borough Local Plan 2015, CBC engaged in the Reigate and Banstead Borough Council’s promotion and allocation of Horley Strategic Business Park through their Site Allocation and Development Management Plan. This 31ha site is anticipated to provide predominantly offices (B1a Use Class), with limited B1b, B1c, B8, and non-B Class uses including appropriate airport-related Sui Generis uses. Reigate and Banstead Borough Council has confirmed that the Horley allocation will not be able to assist

Crawley in meeting any unmet needs for industrial, manufacturing or distribution accommodation.

- 2.3.15 **Flooding:** An update to the cross-boundary Strategic Flood Risk Assessment has been undertaken jointly across Crawley and Horsham.
- 2.3.16 **Ashdown Forest:** Participation in securing an agreed approach forward in relation to the ongoing monitoring and protection of the protected habitats associated with the Ashdown Forest.
- 2.3.17 **Arun Valley:** the Water Cycle Study review has highlighted a concern relating to the impact of abstraction of water for supplying parts of Crawley on ecological designations and habitat. This has been explored through the Habitats Regulations Assessment (HRA). Further work has been commissioned jointly by the authorities supplied from the Southern Water Sussex North Water Resource Zone, in partnership with Southern Water, Environment Agency and Natural England, to assess the in-combination impacts of planned growth, and to consider, having regard to technical feasibility and viability, if greater water efficiency standards (tighter than 100l/p/d) is required to achieve water neutrality.

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### 3. Strategic Issues

#### 3.1 Issue A: Meeting Housing Needs

##### Extent of the Issue

##### Overall Housing Need and Housing Supply

- 3.1.1 Crawley's development as a New Town, in addition to the influence of Gatwick Airport, has significant implications for the future of the town in terms of population growth; and the need to accommodate development remains a key challenge for Crawley. By 2037, to meet the needs of its growing population, the town would need a further 11,488<sup>20</sup> new homes.
- 3.1.2 Crawley's identified land supply allows for around 46% of its housing needs to be met through new housing developments within the borough boundaries: a minimum totalling 5,320 dwellings. This is an increase of 514 dwellings since the Regulation 18 draft Local Plan (July 2019), due to additional sites, increased densities of existing sites following a reassessment of each of these sites and an increased windfall figure from 55dpa to 90dpa due to a review of the evidence.
- 3.1.3 Notwithstanding the increases made, this figure also reflects high delivery rates already taken place in the years 2019 – 2021, and the extension of the Plan period to 2037, to cover the full 15 years beyond the Plan's adoption, which has had a 'dampening' effect on the overall Plan figure (i.e. it no longer includes previously allocated sites which have subsequently now already been built out). This has meant the figures differ from those previously consulted upon during the initial Regulation 19 consultation held at the start of 2020, and which formed the figures set out within the letters sent to the neighbouring authorities.
- 3.1.4 The overall housing land supply equates to an annualised average of 332.5dpa. However, a stepped trajectory is reflected in the Policy to account for the current economic downturn caused by the COVID-19 crisis, and stepping up to higher delivery in the mid-Plan period, as the economy recovers, and the lower anticipated levels towards the end (due to the build out of the last remaining large sites available within the borough):
- Years 1-5 (2021-26): 350dpa
  - Years 6-10 (2026-31): 450dpa
  - Years 11-16 (2031-37): 220dpa
- 3.1.5 This equates to a correlating total unmet need over the Plan period (2021 – 2037) of 6,168 dwellings; as an annualised average this is 385.5dpa. In line with the housing trajectory, the unmet need is anticipated to arise at the following rates:
- Years 1-5 (2021-26): 368dpa
  - Years 6-10 (2026-31): 268dpa
  - Years 11-16 (2031-37): 498dpa

##### Needs of Specific Communities within the Borough

- 3.1.6 In addition to the overall unmet housing needs amount, the 2019 Strategic Housing Market Assessment (SHMA) has considered the needs of specific communities within the borough. This has included:
- Those who require affordable housing
  - Families with children
  - Older people
  - Students
  - People with disabilities

<sup>20</sup> For the period from 2021 to 2037: 718 dwellings per annum x 16years, based on the Standard Methodology Figure 2014-based Household Projections, calculated March 2021.

- People who rent their homes and
- People wishing to commission or build their own homes.

*Affordable Housing:*

3.1.7 With particular reference to affordable housing, the 2019 SHMA highlighted a net need for 739 affordable homes per year in Crawley (of which 563 dwellings per year are needed as rented affordable housing). As Crawley is only able to meet approximately 46% of its overall housing needs, calculated by the Standard Method, within the borough, even if the Local Plan were able to seek the full 40% affordable housing requirement from all new housing developments, there would be a significant shortfall of affordable housing.

	Overall Need (2021 – 2037)	Crawley Local Plan Review (January 2021)	Unmet Need (2021 – 2031)
<b>Housing</b>	11,488 dwellings	5,320 dwellings	6,168 dwellings
<b>Affordable Housing</b>	11,824 affordable dwellings total: 739dpa (of which 9,008 dwellings are required for affordable rent)	2,128 affordable dwellings: 133dpa (assuming 40% of total housing supply; of which 1,560 dwellings would be for rental based on the 75/25 split)	9,696 affordable dwellings: 606dpa (of which 6,885 dwellings is unmet affordable rent)

3.1.8 This situation is exacerbated as the Viability evidence to support the Crawley Local Plan has highlighted a significant concern regarding the viability of the Town Centre and high density schemes. This is particularly due to the high existing land values (including due to opportunities for alternative uses) and the higher costs associated with building at higher rises needed to achieve the higher densities on small sites. This has reduced the ability to secure 40% affordable housing on such schemes. For Town Centre and high density schemes highlighting viability constraints, a 25% affordable housing target is set. This requires 15% of the affordable housing provision to be provided as affordable rent, and 10% to be provided as intermediate (including affordable home ownership) tenures.

*Self and Custom Build Homes:*

3.1.9 The SHMA has also highlighted the need for Duty to Cooperate discussions to explore opportunities to meet needs of those who wish to Self- or Custom-Build their own home. As a planned, urban New Town, the potential for meeting the level of development needed is limited within Crawley borough. Also, the high density nature of the majority of Crawley’s anticipated delivery, particularly in the Town Centre, is not often appropriate for Self- or Custom-Builders.

Strategic Housing Provision

3.1.10 Historically, CBC has worked jointly with Mid Sussex and Horsham District Councils to maximise the sustainable delivery of housing needed for the housing market area. This has included a number of strategic studies, including the At Crawley Study (2009), the New Market Town Study (2010) and West Sussex Bio City (2010). Through this joint working, the successful adoption of the Joint Area Action Plan for West of Bewbush resulted in the subsequent build-out of Kilnwood Vale as a new neighbourhood to Crawley within Horsham District. This includes 2,886 homes, currently under construction.

3.1.11 The Local Plan acknowledges that urban extensions to Crawley are an appropriate way to meet the needs of the emerging households from within the existing population. In addition to Kilnwood Vale, and the new neighbourhood within Crawley’s administrative boundaries, Forge Wood (for 2,085 new homes, including Steers Lane), other significant level development is taking place to the east of

Crawley, at land west of Copthorne (500 new dwellings), to the west along Rusper Road (131 new dwellings) and to the south at Pease Pottage (765 new dwellings total – with 619 of these new dwellings located in a strategic allocation in the Mid Sussex District Plan, in the Area of Outstanding Natural Beauty, and the remaining units from smaller sites within and around Pease Pottage). The housing supply from the sites at Kilnwood Vale, Rusper Road, Copthorne and Pease Pottage, whilst close to the administrative boundaries of Crawley, count towards meeting the housing requirement of Horsham and Mid Sussex respectively rather than meeting the housing requirement set out in the Crawley Borough Local Plan.

- 3.1.12 Other potential urban extensions have historically been promoted to the east and west of the borough boundary. In particular, since the adoption of the Crawley Borough Local Plan 2015 and the Horsham District Planning Framework 2015, the potential for significant levels of up to 10,000 new dwellings, provided in the form of three new neighbourhoods to Crawley, is being pursued through the Horsham District Local Plan, by Homes England. This involves three potential phases: land west of Ifield (for approximately 3,750 new dwellings); land west of Kilnwood Vale (for approximately an additional 1,500 new dwellings); and further land between these to connect the neighbourhoods in the form of a further new neighbourhood (for the remaining 4,750 dwellings). The anticipated dwelling numbers are currently only indicative and will be subject to further work – including evidence on capacities and levels of deliverability during the Plan period. Whilst this land is almost wholly outside of the borough's administrative boundaries, and falls within the considerations for the Horsham District Local Plan review, the implications and impacts of development of such scale in this location would substantially be upon Crawley.
- 3.1.13 CBC has taken this opportunity seriously and has actively and positively engaged as a full partner in the discussions. In particular, it has been considered critical to assess the scheme in its entirety, over a longer period. Otherwise, should this be approached in a piecemeal manner, it is:
- unlikely that essential infrastructure will be properly planned for, phased and provided;
  - likely to fail to capture the existing character, vistas, landscapes, built features and setting of the town and adjacent countryside; and
  - likely that opportunities for creating high quality compact development and expanding Crawley's sustainable transport infrastructure will be missed.

#### **Nature of Cooperation**

- 3.1.14 The scale of unmet need of over 6,000 dwellings over the Plan period is fully acknowledged and is being discussed with neighbouring authorities in a constructive and effective manner, including across the wider geographic area of the Gatwick Diamond and West Sussex and Greater Brighton.
- 3.1.15 Crawley's housing market functions within the area identified as the Northern West Sussex Housing Market Area, which is predominantly within the local authority administrative areas of Crawley Borough, Horsham and Mid Sussex Districts; extending northwards into the administrative area of Reigate and Banstead Borough to a lesser degree.
- 3.1.16 In the preparation of the adopted Crawley Borough Local Plan 2015, it was recognised by the authorities across the Northern West Sussex Housing Market Area that CBC had sought to fully maximise its capacity for housing development within the borough boundaries in order to meet its own housing needs<sup>21</sup>. Similarly, each authority within the area considers it is doing the maximum reasonable to meet the

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<sup>21</sup> Northern West Sussex Authorities Position Statement, paragraph 6.13 (September 2013), Crawley Borough Council, Horsham District Council and Mid Sussex District Council

objectively assessed housing needs of the area as a whole, taking into account local constraints, local aspirations and the need for sustainable development<sup>22</sup>. Further acknowledgement is provided within the adopted Development Plans for Horsham, Mid Sussex and Reigate and Banstead: with recognition that their housing provision figures will contribute to meeting the wider needs of the Northern West Sussex Housing Market Area and supporting the delivery of economic growth within the Gatwick Diamond<sup>23</sup>. The outcome of this cooperation resulted in the vast majority of the housing need across the Housing Market Area being met through these adopted Development Plans, as set out in Table 1.3.

- 3.1.17 However, the increase in projected annual household growth through the Standard Method (which includes an uplift for addressing affordability), and the additional years beyond the adopted Plan period (2030 – 2037) has increased the amount of unmet need to be addressed by the Local Plan Review. This is acknowledged to be increasingly challenging for the Housing Market Area, as the need figures for Mid Sussex and Horsham districts using the Standard Method are also significantly increasing, without including any additional amount to meet Crawley’s unmet needs.
- 3.1.18 Furthermore, it is acknowledged that the Northern West Sussex Housing Market Area does not function independently and the edges between adjoining housing market areas are not clearly defined along administrative boundaries. It is also understood that housing market areas operate as a layered system of tiers, and some have less clearly identified areas of movement in terms of inter-migration and travel-to-work.
- 3.1.19 The SHMA confirms that development “at Crawley” would contribute towards meeting Crawley’s housing needs and should be expected to have regard to the nature of Crawley’s housing need identified within the study<sup>24</sup>.
- 3.1.20 Table 3.1 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to housing needs.

**Table 3.1: Housing Needs Cooperation**

Authorities	Cooperation	Outputs
Crawley Borough and Mid Sussex District	Crawley’s attendance and representations to the Mid Sussex District Plan Examination – highlighting Crawley’s ongoing unmet housing need beyond the existing Plan periods.	Confirmation in the Mid Sussex District Plan for the HMAs future unmet needs to be considered through the District Plan Review.
West Sussex and Greater Brighton Strategic Planning Board (see Table 1.1 for membership)	All partners have recognised that a full review of LSS2 will be required to address longer term issues. In particular, the third version of the Statement (LSS3) will need to robustly address the continuing gap between objectively assessed housing needs and housing delivery in the sub-region and the continuing challenges around	All WS&GB partners have committed to undertaking the following: a. Robustly and creatively explore options for meeting the unmet needs across the Board area, starting by leaving ‘no stone unturned’ within the respective administrative

<sup>22</sup> Northern West Sussex Authorities Position Statement, paragraph 6.21 (February 2015), Crawley Borough Council, Horsham District Council and Mid Sussex District Council

<sup>23</sup> Reigate and Banstead Core Strategy, paragraph 7.4.1 – 7.4.4 (2013) Reigate and Banstead Borough Council; Horsham District Planning Framework, paragraph 6.3 (November 2015) Horsham District Council; Mid Sussex District Plan 2014 – 2031, Policy DP4: Housing, second paragraph, page 30, and Policy DP5: Planning to Meet Future Housing Need, pages 33-34 (March 2018) Mid Sussex District Council

<sup>24</sup> Northern West Sussex Strategic Housing Market Assessment, paras. 5.86-5.89 and 13.13, and Local Housing Need: Implications, page 59 (2019) Icen Projects

Authorities	Cooperation	Outputs
	<p>supporting sustainable economic growth and infrastructure investment. A Strategic Planning Adviser is in post and an updated Statement of Common Ground is being prepared. This is likely to document the extent of unmet housing need to reflect a commonly agreed position.</p>	<p>boundary for the period up to 2030 and for these options to inform Local Plan reviews;</p> <p>b. Prepare a Local Strategic Statement 3 covering the period 2030 to 2050 with an appropriate level of stakeholder participation to ensure that all those with an interest in LSS3 have an opportunity to engage in the development of the strategy;</p> <p>c. Commission work to provide an evidence base for the preparation of a Local Strategic Statement 3 which covers the following:</p> <ul style="list-style-type: none"> <li>• A baseline of current growth proposals and an understanding of any shortfall in housing, employment and infrastructure provision;</li> <li>• A common methodology for determining the ‘no stone unturned’ approach to identifying possible locations to meet any unmet need;</li> <li>• The capacity of the Board area to absorb further growth in this period;</li> <li>• The likely required level of growth between 2030 and 2050;</li> <li>• The strategic options available to deliver additional growth;</li> <li>• The investment necessary (in infrastructure) to ensure the successful delivery of appropriate growth.</li> </ul>
<p>Gatwick Diamond Authorities (see Table 1.1 for membership)</p>	<p>Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.</p>	<p>Joint strategic priority across the authorities for “Delivering a Choice and Mix of Homes”.</p>
<p>Gatwick Diamond Authorities (see</p>	<p>Joint Representation and Participation at the London Plan Examination in Public.</p>	<p>London Plan Examination Report – requiring the London Plan to early</p>

Authorities	Cooperation	Outputs
Table 1.1 for membership)		review, and including Green Belt review.
Crawley, Horsham and Mid Sussex Districts, and West Sussex County	Meetings as Northern West Sussex Authorities to discuss strategic emerging matters, evidence base and Local Plan Reviews.	<p>NWS Statement of Common Ground: Agreements</p> <p><b>2. The parties agree that each authority has assessed the ability of its area to accommodate housing development. They each consider that they are doing the maximum reasonable to meet the housing needs, established by the current adopted Plans, of the Housing Market Area as a whole.</b></p> <p><b>3. The authorities agree to continue to work positively together to seek to address the future housing needs of the Housing Market Area as far as possible, taking into account local constraints, and the need for sustainable development.</b></p> <p><b>4. The authorities will explore the potential opportunities and mechanisms for meeting the housing needs for different groups in the community across the Housing Market Area.</b></p>
Crawley Borough and Horsham District	Joint commission of Strategic Housing Market Assessment Update to secure up-to-date evidence in relation to housing needs for the two authority areas within the context of the Northern West Sussex Housing Market Area.	Northern West Sussex Strategic Housing Market Assessment (November 2019)
Crawley Borough, Horsham District and West Sussex County	<p>On-going discussions in relation to Strategic Site proposals, including:</p> <ul style="list-style-type: none"> <li>• Urban Design expertise;</li> <li>• shared coordination of Transport Modelling and Open Space evidence;</li> <li>• approach to Crawley Western Link Road;</li> <li>• blended housing mix and affordable housing;</li> <li>• unmet education needs;</li> </ul>	<p>Jointly Signed PPA for pre-application discussions for first phase of Homes England proposals.</p> <p>CBC comments on Submitted Environmental Impact Assessment Scoping Opinion for development on land west of Ifield.</p> <p>Crawley Submission draft Local Plan supporting text, paras. 12.17 – 12.23 and Policy ST4.</p>

Authorities	Cooperation	Outputs
	<ul style="list-style-type: none"> <li>shared findings related to Habitats Regulations Assessment and shared commissioning of additional work in relation to water abstraction and water neutrality.</li> </ul>	CBC/HDC Statement of Common Ground (in preparation).
Crawley and the Coast to Capital LEP Authorities	Letters to 12 Authorities confirming Crawley’s Submission draft Local Plan unmet needs, including the overall housing number, based on the Standard Methodology approach, and requesting discussions in relation to meeting the needs of specific groups including affordable housing and self- and custom-build.	<p>Responses received from the following Authorities:</p> <ul style="list-style-type: none"> <li>→ Adur &amp; Worthing Councils</li> <li>→ Arun District Council</li> <li>→ Brighton &amp; Hove City Council</li> <li>→ Horsham District Council</li> <li>→ Mid Sussex District Council</li> <li>→ Mole Valley District Council</li> <li>→ Reigate &amp; Banstead Borough Council</li> <li>→ Tandridge District Council</li> <li>→ Waverley Borough Council</li> </ul> <p>No authorities were in a position to confirm they could meet Crawley’s unmet housing needs, but MSDC and HDC confirmed they would continue to seek to address them as part of the HMA.</p>
	One-to-one discussions	<p>Statements of Common Ground agreed with:</p> <ul style="list-style-type: none"> <li>→ Mid Sussex District Council</li> <li>→ Tandridge District Council</li> <li>→ Mole Valley District Council</li> <li>→ Reigate &amp; Banstead Borough Council</li> </ul> <p>Statements of Common Ground in preparation with:</p> <ul style="list-style-type: none"> <li>→ Horsham District Council</li> </ul>

### Outstanding Issues & Ongoing Cooperation

**Action:** Ongoing discussions are necessary to resolve the remaining unmet needs arising from Crawley over the Review Plan period, including affordable housing, housing mix and self- and custom-build housing, particularly with its neighbouring authorities within the Housing Market Area as part of their Local Plan Reviews.

**Action:** Ongoing discussions as part of the Horsham District Local Plan Review evidence, policy preparation, consultation and examination in relation to Homes England’s strategic development proposals for land to the west of Crawley to form up to three new neighbourhoods for Crawley over the longer period.

**Action:** Ongoing discussions as part of the PPA and development management processes on any masterplans, planning applications, and affordable housing nomination rights, for Homes England’s strategic development proposals,

particularly for land to the west of Ifield to form the first new neighbourhood for Crawley.

**Action:** Ongoing discussions are necessary between Crawley and its adjoining authorities and the County Council in relation to potential further urban extensions to the borough for the medium- to long-term, beyond the Plan period.

**Action:** Ongoing active participation in the West Sussex and Greater Brighton partnership relating to the strategic delivery and solutions to meeting wider housing needs and unlocking opportunities through securing comprehensive infrastructure improvements for the longer term.

### 3.2 Issue B: Gypsy, Travellers and Travelling Showpeople

#### **Extent of the Issue**

3.2.1 The revised Crawley Gypsy, Traveller and Travelling Showpeople (GTTS) Accommodation Needs Assessment (2020) confirms that there remains to be no immediate need for new pitch or plot provision. However, there may be a potential future need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. This supports the previous conclusions from the evidence undertaken to support the adopted Local Plan. The Local Plan Review continues to allocate a site at Broadfield Kennels for this purpose, should a need arise during the mid to latter part of the Plan period.

3.2.2 The findings of the GTTS Accommodation Needs Assessment highlighted the brief and transient nature of the Gypsy and Traveller communities which have stayed within Crawley over the period since 2014/15, predominantly heading for coastal destinations, as well as the limited number.

#### **Nature of Cooperation**

3.2.2 Table 3.2 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to Gypsy, Travellers and Travelling Showpeople.

**Table 3.2: Gypsy, Traveller and Travelling Showpeople Cooperation**

<b>Authorities</b>	<b>Cooperation</b>	<b>Outputs</b>
West Sussex County, Districts and Boroughs	Joint working to secure a shared Transit Site within the County for use by all districts and boroughs, to support Sussex Police.	A shared Transit Site located in Chichester.
Gatwick Diamond Authorities (see Table 1.1 for membership)	Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.	Joint strategic Priority Theme across the authorities for “3. Delivering a Choice and Mix of Homes”.  Agreement for each authority to seek to meet permanent accommodation needs of the Gypsy, Traveller and Travelling Showpeople with their own administrative boundaries.
Crawley Borough, Horsham and Mid Sussex Districts, and West Sussex County	Meetings as Northern West Sussex Authorities to discuss strategic emerging matters, evidence base and Local Plan Reviews.	NWS Statement of Common Ground.

Authorities	Cooperation	Outputs
	One-to-one discussions	<p>Statements of Common Ground agreed with:</p> <ul style="list-style-type: none"> <li>→ Tandridge District Council</li> <li>→ Mole Valley District Council</li> <li>→ Reigate &amp; Banstead Borough Council</li> </ul> <p>Statements of Common Ground in preparation with:</p> <ul style="list-style-type: none"> <li>→ Horsham District Council</li> </ul>

### Outstanding Issues & Ongoing Cooperation

**Action: Ongoing joint working will need to continue to understand the evolving nature of the travelling families within the borough and the interactions across the wider area.**

#### 3.3 Issue C: Economic Growth

##### Extent of the Issue

- 3.3.1 Crawley, primarily due to the strength of Manor Royal and Gatwick Airport, represents the largest and most significant commercial centre within the sub-region, accommodating 48% of all employment floorspace in Northern West Sussex. Its locational strengths, including proximity to an international airport at Gatwick, the M23/motorway network and fast rail links to London and the south coast combined with its specific employment offer mean that Crawley doesn't directly compete with other smaller centres in West Sussex but instead with larger centres in the wider South East such as Croydon, Basingstoke and Guildford.
- 3.3.2 Joint working has been undertaken across Northern West Sussex on behalf of CBC, Horsham and Mid Sussex District Councils through the joint commissioning of the recent Economic Growth Assessment (EGA), 2020. The study confirms that Northern West Sussex (NWS) continues to operate as a broad Functional Economic Market Area, with its spatial extent largely consistent with the authority boundaries of Crawley, Horsham and Mid Sussex. Economic linkages with adjoining areas such as Coastal West Sussex, Reigate & Banstead (i.e. Horley) and East Sussex are comparatively weaker but still have an influence. The EGA undertakes a detailed appraisal of the NWS economy, having regard to market intelligence and sectoral analysis, as well as considering the opportunities, challenges and growth needs in detail for each local authority area. The study clarifies and evidences the inter-dependency of the North West Sussex area, recognising the interaction between areas and the inter-related issues of land supply and demand within a Gatwick Diamond context. Given the significant demand from businesses seeking to locate in Crawley, the EGA recognises that if new business land cannot be identified in Crawley, some business needs could be displaced outside the borough, or outside of the sub-region entirely.
- 3.3.3 A Crawley Focused EGA Update (September 2020) was commissioned, particularly in light of the significant economic impact of COVID-19 on the borough, and sensitivity checking forecasts from the original EGA through additional sectoral analysis. This identified need for a minimum of 38.7ha new business land in the borough for the period to 2036. This need is significantly within the industrial sectors (32.8ha), with office needs accounting for 5.9ha of the total. Crawley's Employment Land Trajectory (September 2020) identifies an available employment land supply pipeline of 17.6ha, which comprises 8.8ha office land and 8.7ha industrial land. This

supply is sufficient to meet Crawley's quantitative office needs in full, though there is only sufficient land to meet industrial needs in the early part of the Plan period, resulting in a shortfall of 24.1ha industrial land, principally within the B8 storage & distribution sectors. To meet Crawley's outstanding employment needs in full, an industrial-led Strategic Employment Location is allocated at Land East of Balcombe Road and South of the M23 Spur, referred to as Gatwick Green. There are, therefore, no unmet employment needs arising from Crawley.

- 3.3.4 A separate Crawley Retail, Commercial Leisure and Neighbourhood Needs Assessment has been prepared to inform the Local Plan. This has, amongst other objectives, prepared an assessment of Crawley's retail and leisure needs, having regard to its role and relationships in the wider retail catchment.

### **Nature of Cooperation**

- 3.3.5 The Gatwick Diamond Local Strategic Statement establishes the following as a Priority Theme: "Achieving a Sustainable Economy and Prosperity including Supporting Low Carbon Growth". This supports economic growth to:

- Ensure that opportunities to grow a knowledge-driven economy are maximised;
- Develop and maintain strategies for securing more sustainable forms of development to deliver an efficient, low carbon economy;
- Sustain a flourishing and competitive knowledge based economy with high levels of entrepreneurship, providing sustainable employment;
- Allow businesses to operate in an environment which enables the Diamond to be recognised, nationally and internationally, as one of the top locations for business;
- Regenerate areas which need change and improvement to meet modern investor and business expectations.

- 3.3.6 This Theme is to be addressed by, amongst other things, planning for continued economic growth building on the opportunities already identified in local authority and LEP plans to secure a knowledge based economy; develop economic development activities to attract new businesses and retain existing businesses to support the whole Gatwick Diamond economy; build on and develop industry expertise, whilst seizing and delivering upon opportunities to make significant statements of intent such as new science/office/business parks, continued support for economic growth in existing employment areas and support for town centre regeneration and growth; and coordinate employment land policies to secure and support the retention of employment land necessary to provide a mix and choice of high quality sites and locations<sup>25</sup>.

- 3.3.7 Given its constrained land supply position, the adopted Local Plan had sought to protect and maximise the use of existing main employment areas, whilst taking a positive approach to allow small extensions to Manor Royal outside of the safeguarded land. Given the constraints posed by safeguarding, the 2015 Local Plan introduced a sequential approach to identifying appropriate locations for new business-led growth, focusing respectively on delivering sites on:

- i. Land within Crawley, in the north of the borough (this would be reliant on the ability to remove safeguarding for a potential future southern runway at Gatwick Airport);
- ii. Land at Crawley/Gatwick, in the areas immediately adjoining the borough;
- iii. Land near Crawley/Gatwick.

- 3.3.8 CBC actively engaged throughout the Reigate and Banstead Development Management Plan evidence preparation, consultation and examination process in

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<sup>25</sup> Gatwick Diamond Local Strategic Statement 2016, Priority Theme 1, pages 24-28 (June 2017)  
Chilmark Consulting: <https://crawley.gov.uk/sites/default/files/documents/PUB344429.pdf>

relation to the allocation of a Strategic Employment Site in Reigate and Banstead borough. The Horley Strategic Business Park, allocated by Policy HOR9 of the Reigate and Banstead Development Management Policies DPD, is anticipated to approximately 200,000 square metres of office-led employment floorspace. The allocation will meet a significant proportion of Crawley’s identified office needs from the adopted Crawley Local Plan 2015, though will not meet any of its outstanding industrial needs, including those identified in the Local Plan Review.

- 3.3.9 Access to high quality digital infrastructure will be important to supporting economic growth and enhancing the provision to local communities, with investment in full fibre broadband connectivity identified as a priority in both the Coast to Capital LEP Strategic Economic Plan and in the Gatwick Diamond Local Strategic Statement. West Sussex councils, including Crawley, are working together to build full fibre infrastructure that will connect key public sector sites, capable of delivering speeds from 1,000 megabits per second (1 gigabit) to meet the future need of public services. There is a commitment to providing greater coverage of full fibre within the county by working with the market to benefit homes and businesses in the future. Joint discussions regarding policy wording have also taken place.
- 3.3.10 To inform work on the Crawley Retail, Commercial Leisure and Neighbourhood Needs Assessment, all local authorities within Crawley’s retail catchment area were contacted. Their input into the study was requested to help understand the retail/leisure position for each authority, and they were advised of telephone surveys being undertake as part of the study.
- 3.3.11 Table 3.3 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to Economic Growth.

**Table 3.3: Economic Growth Cooperation**

<b>Authorities</b>	<b>Cooperation</b>	<b>Outputs</b>
West Sussex and Greater Brighton (see Table 1.1 for membership)	See Table 3.1 above.	See Table 3.1 above.
Gatwick Diamond Authorities (see Table 1.1 for membership)	Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.	Joint strategic Priority Themes across the authorities for “1. Achieving A Sustainable Economy and Prosperity including Supporting Low Carbon Growth”; “2. Investing in Urban and Rural Centres” and “4. Education and Skills”.
Crawley Borough, Horsham and Mid Sussex Districts and West Sussex County	Meetings as Northern West Sussex Authorities to discuss strategic emerging matters, evidence base and Local Plan Reviews.	NWS Statement of Common Ground.
Crawley Borough, Horsham and Mid Sussex Districts	Joint commission of Economic Growth Assessment Update to secure up-to-date evidence in relation to economic needs for the three authority areas within the context of the Northern West Sussex. Sharing of brief and findings of local authority-specific EGA updated.	Northern West Sussex Economic Growth Assessment (January 2020)  Crawley Focused EGA update (September 2020)

Authorities	Cooperation	Outputs
Crawley and Reigate and Banstead Boroughs	<p>Representations to the RBBC Development Plan Document and attendance at the Examination Hearing Sessions as well as on-going discussions in relation to Strategic Site proposals.</p> <p>This has included sharing of draft evidence between the local authorities, with RBBC having shared draft evidence relating to the Horley Strategic Business Park allocation and CBC having shared the draft NWS EGA and Crawley focused update.</p>	<p>RBBC adoption of the Reigate and Banstead Borough Council Development Plan Document and allocation of Horley Business Park.</p> <p>Statement of Common Ground agreed (February 2021).</p>
Crawley Borough and West Sussex County	<p>Liaisons and agreement in relation to High quality communications connectivity. This has included meetings with WSCC, WSCC input into policy drafting, and attendance at WSCC digital conference.</p>	<p>Agreed draft Local Plan Policy IN3: Supporting High Quality Communications.</p>
Reigate & Banstead, Mole Valley, Tandridge, Mid Sussex, Horsham, Epsom & Ewell, Wealden, Sevenoaks	<p>Information request with regards to planned retail and commercial leisure development.</p>	<p>Crawley Retail, Commercial Leisure and Town Centre Neighbourhood Needs Assessment (2020)</p>
	<p>One-to-one discussions</p>	<p>Statements of Common Ground agreed with:</p> <ul style="list-style-type: none"> <li>→ Mole Valley District Council</li> <li>→ Reigate &amp; Banstead Borough Council</li> </ul> <p>Statements of Common Ground in preparation with:</p> <ul style="list-style-type: none"> <li>→ Horsham District Council</li> </ul>

### Outstanding Issues & Ongoing Cooperation

**Action: Ongoing discussions in relation to strategic employment locations, particularly related to transport implications with West Sussex County Council, Reigate and Banstead Borough Council and Surrey County Council.**

#### 3.4 Issue D: Gatwick Airport

##### **Extent of the Issue**

3.4.1 Gatwick Airport lies within the borough of Crawley and at peak times, prior to the Covid-19 pandemic, was the busiest single runway airport in the world. In 2018/19, Gatwick Airport handled 46.4million passengers. The presence and operation of an international airport within the borough generates specific planning issues which need to be addressed by local planning policies. The Airport generates a significant number of economic benefits both directly through its own employment requirements but also, indirectly, through the wider benefits to the regional and local economy which make Crawley and the wider Gatwick Diamond area highly attractive to employers and businesses. However, it also creates significant environmental impacts particularly as a result of air traffic movements and surface access to the

airport. The airport operator and the councils around the airport work together to maximise the benefits associated with the airport whilst seeking to reduce any significant adverse effects.

- 3.4.2 The council is consulted on any developments which the airport operator proposes to undertake under its permitted development rights. The council, as the Local Planning Authority, also determines any planning applications for more significant developments which are not classified as permitted development. Development required to support the growth in capacity of the airport over 10mppa, for example through the routine use of the northern standby runway, would be considered as a Nationally Significant Infrastructure Project under the Planning Act 2008, and as such would be determined by the Secretary of State for Transport, advised by the Planning Inspectorate, through the Development Consent Order (DCO) process.

#### **Nature of Cooperation**

- 3.4.3 Whilst Gatwick Airport is located within CBC's administrative boundaries, a range of impacts affect a much wider area. Reflecting this, there are a number of established groupings relating to the functioning and development of Gatwick Airport across a range of administrative and professional and technical areas. The local authorities neighbouring the airport work together at officer (the Gatwick Officers Group) and member (the Gatwick Joint Local Authorities) level, as well as the Chief Executives and leaders meeting regularly and the authorities taking part in the Gatwick Airport Consultative Committee (GATCOM), the latter of these meetings also being attended by a range of stakeholders including Gatwick Airport Limited, parish councils, business and airline representatives and local environmental groups. Some of the authorities also take part in the Noise and Track Monitoring Advisory Group, and the Noise Management Board.
- 3.4.4 There is a long-standing S106 Agreement between Gatwick Airport Limited (GAL), Crawley Borough Council and West Sussex County Council to ensure that, as the Airport grows, measures are in place to minimise, so far as possible, its short and longer-term environmental impacts; and to maintain and enhance the ways the parties share information and work together to bring benefits to the Airport and the communities it serves. The Agreement includes financial commitments and monitoring obligations on the Airport operator. The surrounding districts and counties (East Sussex County Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council and Tandridge District Council) are named in the Agreement as Adjoining Authorities, and it places obligations on the Borough Council to meet with them regularly to discuss and consider the S106, current and emerging issues related to operation, growth and development of the Airport, including its Master Plan, airport parking, air quality, noise and surface transport. These arrangements are further detailed in a supporting Memorandum of Understanding (2009) between the Gatwick Local Authorities.
- 3.4.5 The S106 Agreement also commits the council and West Sussex to meet with GAL regularly to provide feedback on issues being raised through the Gatwick Officers Group and Gatwick Joint Local Authorities, and to contribute towards undertaking and funding annual monitoring of the obligations. The latest S106 Agreement was signed in April 2019 and expires in December 2021. As required by the Agreement, discussions have already commenced with GAL to update it.

#### *Impacts of COVID-19:*

- 3.4.6 The authorities, GAL, and the LEP are currently working together to understand the impacts of the current economic crisis caused by the Covid-19 pandemic which has been particularly significant in the Crawley/Horley area due to its reliance on aviation and related employment sectors. This has been explored further through the Crawley

focused EGA update (September 2020) and the emerging Economic Development Strategy.

*Potential Growth of the Airport (Development Consent Order):*

3.4.7 The authorities are also collaborating to understand the implications of the proposed Northern Runway NSIP project on the environment, community and economy, and to respond to the DCO application to ensure that Gatwick Airport and the Planning Inspectorate are aware of the councils’ positions in relation to the opportunities and implications associated with airport growth.

*Airport Parking:*

3.4.8 The airport operator is on track to achieve the target of 48% non-transfer passengers arriving at the airport by public transport, but this still requires a significant amount of on-airport parking facilities for those passengers that choose to access the airport by private car. There are some authorised sites off-airport, but also many unauthorised sites, or requests for planning permission. Sites within the airport boundary provide the most sustainable location for any additional long stay parking as they are close to the terminals and can help reduce the number and length of trips. The Airport operator is responsible for meeting the modal split target and it is important that the level of provision of car parking spaces can be appropriately managed. The Gatwick Local Authorities work together with GAL to undertake an Annual Parking Survey of on and off airport parking provision (authorised and unauthorised) and participate in the Surface Access Forum.

3.4.9 Table 3.4 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to Gatwick Airport.

**Table 3.4: Gatwick Airport Cooperation**

Authorities	Cooperation	Outputs
Crawley Borough and West Sussex County and Gatwick Airport	Meetings, communications and tracked-change amendments to update the S106 and agree amended wording where required.	S106 Agreement, including financial commitments and noise and air quality monitoring obligations on the Airport operator.  Surface transport improvements.  Annual Monitoring Report and independent verification of performance.
Gatwick Authorities (see Table 1.1 for membership)	Regular Gatwick Officer Group and Gatwick Joint Local Authority meetings and/or electronic updates. More specialised cross-authority officer engagement relating to specific aspects of the S106 legal agreement. Attendance at GATCOM.	Regular discussion at officer and member level on airport-related issues including noise, air quality, airport parking, Memorandum of Understanding 2008.  Outside of the Local Plan process, discussion of the DCO process, including with GAL.
Gatwick Diamond Authorities (see Table 1.1 for membership)	Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.	Joint strategic Priority Themes across the authorities for “1. Achieving A Sustainable Economy and Prosperity including Supporting Low

Authorities	Cooperation	Outputs
		Carbon Growth”; “2. Investing in Urban and Rural Centres”; “4. Education and Skills”; “5. Infrastructure”; and “6. High Quality Natural Environment, Countryside and Landscape”.
Reigate & Banstead Borough Tandridge District Horsham District Mole Valley District	One-to-one discussions and Surface Access Forum	Comparable Gatwick Parking Policies (adopted and emerging) across the adjoining areas.  Success at Appeal.
	One-to-one discussions	Statements of Common Ground agreed with: → Tandridge District Council → Northern West Sussex Authorities → Mole Valley District Council → Reigate & Banstead Borough Council  Statements of Common Ground in preparation with: → Horsham District Council

### Outstanding Issues & Ongoing Cooperation

**Action: Ongoing discussions and updating of current S106 Agreement**

**Action: Collaboration to understand the implications of the proposed Northern Runway Nationally Significant Infrastructure Project (NSIP) on the environment, community and economy, and to respond to the Development Consent Order (DCO) application.**

**Action: Continued cooperation and engagement in Gatwick-related member and officer groups, including specific interest groups for Noise, Air Quality and Surface Transport.**

### 3.5 Issue E: Key Transport Routes and Sustainable Movement

#### Extent of the Issue

##### *Key Transport Routes:*

- 3.5.1 Crawley has excellent transport connections, lying adjacent to the M23, close to the M25 and on the main railway line linking London to the south coast.
- 3.5.2 The town itself is served by an extensive bus service network including a guided bus service, Fastway, as well as four railway stations and a network of green corridors which provide attractive pedestrian and cycle routes through the neighbourhoods and into the Town Centre and out into the countryside. The National Cycle Routes NCR20 (London to Brighton) and NCR21 (from Greenwich to Eastbourne, and forming part of the “Avenue Verte” Greenway, linking London to Paris) also run through the borough.
- 3.5.3 Transport modelling carried out by Crawley Borough Council provisionally indicates that the development strategy set out in the Crawley Local Plan would be able to be delivered, subject to mitigation measures to manage peak traffic impacts, although

one impacted location remains to be mitigated. Some further work is ongoing is to resolve this location and to demonstrate deliverability of the mitigation strategy. However, where significant strategic development over the longer-term is being proposed by Homes England west of but adjacent to Crawley, the impacts on the already congested highway network within and around the town becomes severely affected. The principle of the need for a 'western link road' for Crawley has long been established and remains an aspiration of the three councils: Crawley Borough, Horsham District and West Sussex County.

*Sustainable Movement:*

- 3.5.4 National and local policy requires that any residential proposals for large applications need to be based on sustainable public transport, cycling and walking. Discussions between CBC, Horsham District Council and West Sussex County Council relating to proposed strategic development adjacent to Crawley have involved ensuring the provision of public transport and active travel routes into Crawley.
- 3.5.5 This has included considerations for the expansion and enhancement of the existing public transport, cycle and footpath networks in Crawley and prevention of faster or simpler car routes directly into the town from the development in Horsham, to ensure sustainable and active travel remains attractive for most short to medium journeys and reduces the impact of additional traffic on the congested existing highway network. The Crawley western link road forms a key part in this. In addition, consideration is being given to opportunities for new public transport links connecting from the proposed new neighbourhoods for Crawley to any key facilities and services to be provided within other developments in Horsham. Discussions have been strongly led by the principle that such proposals for residential development to the west of Crawley will be required to establish development form based on compact layout and scale in order to maximise sustainable movement and public transport viability.

**Nature of Cooperation**

- 3.5.6 Whilst the detailed individual technical evidence work needed to support each local authority Local Plan has been prepared primarily on a borough or district-wide basis, this has been set within the strategic context of the wider transport network. This includes ensuring the work is coordinated across the county level by the county council and across county boundaries into Surrey between the two adjoining county authorities.
- 3.5.7 The Transport Modelling for the Crawley Local Plan has been undertaken at a similar time as that being prepared for Horsham district as part of the Horsham Local Plan Review. This has allowed for as much alignment as possible across the two Local Plan proposed development levels. The draft Plan for Crawley seeks to reserve an area of land from the borough boundary with Horsham to the A23 (north of County Oak) for the alignment of a route for a Crawley western link road. Discussions are ongoing with Horsham District Council to seek to secure a similar allocation reserving land within the emerging draft Horsham Plan to link this fully to the A264. This should be designed to maximise sustainable travel options into Crawley and towards Horsham to access services and facilities, and facilitate a significant modal shift away from using the car for short and medium journeys, from the start.
- 3.5.8 The potential route of the road currently identified through Crawley includes land also safeguarded for future potential runway expansion to the south of Gatwick Airport. Discussions regarding what further work would be necessary to demonstrate these can be compatible are being held between CBC, West Sussex County Council, Homes England and Gatwick Airport Limited.
- 3.5.9 Within Horsham district, two new station sites along the Arun Valley line between Crawley and Horsham, at North Horsham and Kilnwood Vale, have been proposed,

both of which are associated with planned new developments for housing and employment. Joint working with Horsham District Council, West Sussex County Council, Network Rail, the train providers, Department for Transport and the Coast to Capital LEP, has looked into the feasibility of one or both of these being progressed. The study has concluded that at most one new station could be accommodated on the line and there continues to be concerns about the negative impacts of a new station on rail performance and bus patronage which would need to be overcome for a station to come forward.

3.5.10 The West Sussex and South Downs National Park Joint Minerals Local Plan (2018) safeguards the railheads at Crawley Goods Yard from inappropriate neighbouring development that may prejudice its continuing efficient operation. This is shown on the draft Crawley Local Plan Map along with the associated Safeguarded Buffer Zone. This is recognised in the draft Crawley Borough Local Plan allocation at Tinsley Lane (Local Plan Policy H2 and paragraph 12.53) which requires development to be carefully planned, laid out and designed to minimise potential future conflicts and constraints on the important minerals function of the adjacent safeguarded minerals site.

3.5.11 Table 3.5 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to Key Transport Routes.

**Table 3.5: Key Transport Routes Cooperation**

<b>Authorities</b>	<b>Cooperation</b>	<b>Outputs</b>
Gatwick Diamond Authorities	Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.	Joint strategic Priority Theme across the authorities for “5. Infrastructure”.
Crawley and TfSE	Crawley /Gatwick included in the Inner Orbital Study Forum and the South Central Radial Area Study Forum	
West Sussex County Council and Districts and Boroughs	Review of the West Sussex Transport Plan.	Review in progress.
Crawley, West Sussex County and Highways England	Joint preparation of Transport Modelling for the Local Plan Review to understand the implications of incremental development levels above the existing adopted Local Plan as part of the additional five year Local Plan Review period beyond 2030	Commission for transport modelling. Draft Transport Modelling Study.
Crawley, Mid Sussex, Horsham Districts and West Sussex County	Meetings as Northern West Sussex Authorities to discuss strategic emerging matters, evidence base and Local Plan Reviews.	NWS Statement of Common Ground.
Crawley, West Sussex County and Horsham District	Discussions with the Rail Industry regarding potential new rail stations along the Arun Valley Line, associated with new developments between Horsham and Crawley.	Draft Network Rail Timetable Study Draft WSP Timetable Study
Crawley Borough, Horsham District	On-going discussions in relation to Strategic Site proposals, including:	Jointly Signed PPA for pre-application discussions for first

Authorities	Cooperation	Outputs
and West Sussex County	<ul style="list-style-type: none"> <li>• shared coordination of Transport Modelling;</li> <li>• approach to Crawley Western Link Road;</li> <li>• development of potential routes and service frequency for extensions to the Fastway Bus network;</li> <li>• discussion of key cycle and walking routes based upon the findings of the CBC Local Cycling and Walking Infrastructure Plan.</li> </ul>	<p>phase of Homes England proposals.</p> <p>CBC comments on Submitted Environmental Impact Assessment Scoping Opinion for development on land west of Ifield.</p> <p>Crawley Submission draft Local Plan supporting text, paras. 12.17 – 12.23 and Policy ST4.</p> <p>CBC/HDC Statement of Common Ground (in preparation).</p>
Crawley and Tandridge District	Discussions and consideration of the transport modelling associated with the Tandridge District Plan and implications for the road network within and close to Crawley.	CBC/TDC Statement of Common Ground.
Crawley and Reigate & Banstead Borough	Discussions on the implications for the local highway network, particularly in relation to the Strategic Employment Allocations.	CBC/RBBC Statement of Common Ground agreed (February 2021).

### Outstanding Issues & Ongoing Cooperation

**Action:** Further work is needed to understand the combined impacts of the two final Local Plan documents for Crawley and Horsham, once Horsham District Council agree and publish the Submission Draft Horsham Local Plan.

**Action:** There should be a clear commitment by the three authorities (CBC, HDC and WSCC) and Homes England to the full delivery of the Crawley western link road, with funding models and road alignment in place for the entire route as part of the ‘first phase’ of development. The parties to further engage with Gatwick Airport regarding the boundaries of safeguarding, especially in the vicinity of the western link road along the southern boundary.

**Action:** Continued work is needed in relation to ensuring sustainable and active travel aspirations are realised and maximised for strategic new development of new neighbourhood urban extensions to Crawley (as well as within the town by not creating additional traffic, and potentially relieving some of the existing congestion, on the highway network to create high quality, safe, active travel routes), including expansion of the existing network and creating high quality compact development through planned layouts to ensure the viability of public transport.

**Action:** To continue work with Reigate and Banstead Council, along with West Sussex County Council and Surrey County Council, where development with strategic transport implications is proposed close to the authorities’ common administrative boundary, to establish a joint planning policy position to support positive and sustainable development management and maximise infrastructure and sustainability benefits. In particular to continue to discuss any impacts on the strategic road network particularly the M23, the A23 and

**the local road network, including Balcombe Road, and jointly explore opportunities for transport improvements.**

3.6 Issue F: Flooding and Flood Risk

**Extent of the Issue**

- 3.6.1 Crawley borough sits at the southern end of the Upper Mole catchment, close to where it rises at Horsham before flowing northwards towards the River Thames. For Crawley, development (particularly where it increases runoff into the river system) could impact on river flooding downstream within the River Mole catchment. This can have implications for Gatwick Airport and neighbouring authorities, particularly Reigate & Banstead and Mole Valley.
- 3.6.2 Flash flooding from surface water run-off and/or sewer overload has also been an issue across the borough, following heavy localised rainfall events. This issue is not limited to areas identified by the Environment Agency flood risk maps. It is a critical issue for Crawley as the clay soil and density of urban development adds to the ‘flashy’ nature of the catchment and increases the volume of surface water run-off and of run-off via the sewage system. Further development could increase the risk of this type of flooding if not designed properly, potentially increasing flood risk within and beyond the borough.

**Nature of Cooperation**

- 3.6.3 Measures to manage and understand fluvial flood risk on a strategic level are supported by expertise from the Environment Agency, whilst the management of surface water flooding is supervised by the County Council. Consenting and enforcement of changes to smaller watercourses has been delegated down to the district and borough level within West Sussex.
- 3.6.4 Measures including agreed Local Plan policy wording in relation to development and flood risk have evolved from joint working with neighbouring authorities, including West Sussex as Lead Local Flood Authority and the Environment Agency. The preparation of a Local Flood Risk Management Strategy, and also Policy for the Management of Surface Water, is the result of working together with the County Council through joint Flood Risk Management meetings. Crawley’s Strategic Flood Risk Assessment has been prepared jointly with Horsham District Council, in partnership with the Environment Agency, within the context of the wider river basin area. The West Sussex Flood Risk Management Group, comprised of WSCC, the EA (Southern & Thames), Southern Water Services and the seven Borough and District Councils within West Sussex, plans and acts to reduce the risk and consequence of flooding now and in the future.
- 3.6.5 Table 3.6 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to Flooding and Flood Risk.

**Table 3.6: Flooding and Flood Risk Cooperation**

<b>Authorities</b>	<b>Cooperation</b>	<b>Outputs</b>
Gatwick Diamond Authorities	Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.	Joint strategic Priority Theme across the authorities for “5. Infrastructure” and “6. High Quality Natural Environment, Countryside and Landscape”.
West Sussex Flood Management Group	Regular meetings attended by local authority planners and drainage engineers, plus Environment Agency and Southern Water Services.	Local Flood Risk Management Strategy.

Authorities	Cooperation	Outputs
		West Sussex Lead Local Flood Authority Policy for the Management of Surface Water.
Crawley, Reigate and Banstead Borough, Mid Sussex and Horsham Districts	Joint commission of the Water Cycle Study Update.	Gatwick Sub-Region Water Cycle Study (August 2020)
Crawley and Horsham District	Joint commission of Strategic Flood Risk Assessment	Crawley Borough and Upper Mole Level 1 Strategic Flood Risk Assessment (September 2020)
Crawley Borough, Horsham District and West Sussex County	On-going discussions in relation to Strategic Site proposals, including in relation to flooding and drainage expertise.	<p>Jointly Signed PPA for pre-application discussions for first phase of Homes England proposals.</p> <p>CBC comments on Submitted Environmental Impact Assessment Scoping Opinion for development on land west of Ifield.</p> <p>Crawley Submission draft Local Plan supporting text.</p> <p>CBC/HDC Statement of Common Ground (in preparation).</p>
Environment Agency	EA has provided advice in relation to the SFRA and also application of the sequential test for site allocations.	<p>Crawley Borough and Upper Mole Level 1 Strategic Flood Risk Assessment (September 2020).</p> <p>Site Allocations and Flood Risk Background Paper</p> <p>Feedback on emerging Local Plan policies</p>
	One-to-one discussions	<p>Statements of Common Ground agreed with:</p> <ul style="list-style-type: none"> <li>→ NWS Authorities</li> <li>→ Mole Valley District Council</li> <li>→ Reigate &amp; Banstead Borough Council</li> </ul> <p>Statements of Common Ground in preparation with:</p> <ul style="list-style-type: none"> <li>→ Horsham District Council</li> </ul>

### Outstanding Issues & Ongoing Cooperation

**Action: Continued liaison with neighbouring authorities, Lead Local Flood Authority, and Environment Agency on matters of flood risk, mitigation and resilience.**

### 3.7 Issue G: Water Supply and Infrastructure

#### **Extent of the Issue**

- 3.7.1 Crawley is located within the South East, an area of serious water stress. Water stress is a measure of the level of demand for water (from domestic, business and agricultural users) compared to the available freshwater resources. It can cause deterioration of the water environment in both quality and quantity of water, and consequently restricts the ability of a waterbody to achieve 'good' status under the Water Framework Directive.
- 3.7.2 Changing climate conditions are expected to further aggravate water stress in Crawley. Drought is expected in increased frequency and severity and will put additional strain on reservoir and groundwater levels. Extreme rainfall events are also expected to become more frequent and to be more severe. Although seemingly counter-intuitive: increased risk of extreme rainfall can actually further aggravate water stress as most of this water does not soak through to recharge groundwater reserves but instead becomes surface water run-off – increasing the risk of flooding.
- 3.7.3 Crawley's water supply is largely provided by Southern Water, and the borough is located within its Sussex North supply area. During certain supply conditions, groundwater abstraction at Hardham in Horsham District makes a significant contribution to Crawley's supply. Natural England has advised that based on recent evidence, an adverse effect on the integrity of the Arun Valley Special Area of Conservation (SAC), Special Protection Area (SPA) and Ramsar features could not be excluded with certainty.
- 3.7.4 The Water Cycle Study Crawley Addendum Report (January 2021) identifies that the flow permit for Crawley Waste Water Treatment Works is likely to be exceeded towards the end of the 2030 (near the end of the AMP8 period). Thames Water has confirmed that the works is close to its treatment capacity, and will exceed its permit during the Local Plan period. A new permit from the Environment Agency is likely to require a tighter Ammonia, Biochemical Oxygen Demand (BOD) and suspended solids consent, likely requiring an upgrade to achieve. It should be noted that in the event of an upgrade to sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade.

#### **Nature of Cooperation**

- 3.7.4 The Environment Agency and Natural England are working with Southern Water to try to identify a long term more sustainable water supply. In the meantime, whilst the adverse effect remains or is uncertain, development in the Sussex North part of the Gatwick sub-region must be certain not to add to this adverse effect. The council will continue to engage with Southern Water in relation to groundwater extraction at Hardham, and will retain its ongoing relationships with water infrastructure companies, providing an annual profile of projected growth to support them in planning for the provision of sufficient water supply and infrastructure.
- 3.7.5 Crawley's planning policy on water efficiency requires all new dwellings, including the subdivision of existing buildings into multiple dwellings, to achieve stringent water efficiency requirements, recognising that it is an area of serious water stress and reflecting the ambitions of the council and water supply companies to respond to this challenge. The current optional requirement set out in Building Regulations<sup>26</sup> is 110 l/p/d (105 l/p/d with an additional 5 l/p/d for external use). However, the Building Regulations were last updated some time ago, and are designed to apply nationally. They do not specifically take into account the situation in the South East nor the particular circumstances in the Sussex North Water Resource Zone. Given the pressing issue of water stress, the Gatwick Water Cycle Study, with support from the

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<sup>26</sup> Building Regulations Approved Document G (Sanitation, Hot Water Safety and Water Efficient)

Environment Agency, makes a clear recommendation that a tighter water efficiency standard, of 100 l/p/d, is considered the necessary level for Crawley. However, given the significant water supply challenges faced in Sussex North Water Resource Zone, and the potentially significant ecological impacts of groundwater abstraction at Hardham, Crawley is working with other local authorities, Southern Water, Environment Agency and Natural England to assess the in-combination impacts of planned growth, and to consider, having regard to technical feasibility and viability, if greater water efficiency standards (tighter than 100l/p/d) are required to achieve water neutrality.

- 3.7.6 As a developer has the automatic right to connect to the sewer network under the Water Industry Act, the Infrastructure Provider may request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and/or water pollution. It will be important to ensure that growth is aligned with delivery of additional capacity at Crawley Waste Water Treatment Works. Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build.
- 3.7.7 Table 3.10 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to Water Resources.

**Table 3.7: Water Resources Cooperation**

<b>Authorities</b>	<b>Cooperation</b>	<b>Outputs</b>
Gatwick Diamond Authorities	Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.	Joint strategic Priority Theme across the authorities for “5. Infrastructure”.
Crawley Borough, Mid Sussex and Horsham Districts	Meetings as Northern West Sussex Authorities to discuss strategic emerging matters, evidence base and Local Plan Reviews.	NWS Statement of Common Ground.
Crawley Borough, Mid Sussex and Horsham District and Thames Water	Meetings to discuss the water and waste water infrastructure and potential new developments	
Crawley and Reigate and Banstead Boroughs and Mid Sussex and Horsham Districts	Joint commission of the Water Cycle Study Update. This work has also included liaison with South East Water, Southern Water, SES Water, Thames Water, Environment Agency and Natural England.	Gatwick Sub-Region Water Cycle Study (August 2020)
Crawley Borough, Horsham and Chichester Districts and South Downs National Park Authority, Southern Water, Environment	Additional Work across the Sussex North Water Resource Zone, considering the potentially significant ecological impacts of groundwater abstraction at Hardham, to assess the in-combination impacts of planned growth and options for achieving water neutrality.	Work in progress.

Authorities	Cooperation	Outputs
Agency and Natural England. Input from Arun, Mid Sussex and Waverley.		
	One-to-one discussions	Statements of Common Ground agreed/in preparation with: → Horsham District Council

### Outstanding Issues & Ongoing Cooperation

**Action: To understand the options and technical feasibility for achieving water neutrality across the Sussex North Water Resource Zone in the short-medium-term and secure long-term multi-agency solutions for reducing harmful water abstraction at Hardham.**

**Action: Continued liaison with Thames Water to understand Sewage Treatment Capacity and its timetable for upgrades at Crawley Wastewater Treatment Works, particularly in relation to longer term strategic development proposals “At Crawley”.**

### 3.8 Issue H: Green Infrastructure and Biodiversity

#### Extent of the Issue

3.8.1 Whilst the local policies within the Local Plan can ensure the implementation on a site-by-site basis of improvements, enhancements and extensions to the green infrastructure network, it is acknowledged that nature and landscapes do not respect administrative boundaries. The High Weald Area of Outstanding Natural Beauty, Priority Habitat Areas, Ancient Woodland and Landscape Character Areas are examples of such areas. In recent years it has become apparent that to reverse the national decline in biodiversity and to withstand future pressures such as climate change there needs to be an integrated landscape scale approach. This moves away from site based conservation to understanding how the landscape functions to support people and wildlife. The correct scale of this conservation is often broad; a leading example being the High Weald Area of Outstanding Natural Beauty (AONB). This is a nationally important landscape where great weight should be given to conserving the landscape and scenic beauty of the designation – a small area of the High Weald AONB lies within the southern boundary of the borough.

3.8.2 The green landscaping in and around the built environment is a key part of Crawley’s New Town character, as is the setting of the town, with a clear distinction between the urban area and countryside providing a sense of place for residents and visitors and ensuring accessible countryside remains within easy reach by foot. Connections to public rights of way which can be used for multiple types of recreation extend beyond the borough boundary.

#### Nature of Cooperation

3.8.3 By identifying the strategic linkages and critical habitats and areas of importance for the purposes of nature, flood alleviation and recreation, across the wider area each individual administrative area understands the role it plays within this wider picture; and can highlight the important elements necessary for protection and enhancement. This will ensure green infrastructure at a landscape wide level can be properly planned for.

3.8.4 The Ashdown Forest Working Group was established to secure a consistent and agreed approach towards addressing the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) arising from traffic associated with new development. The Working Group prepared and agreed a Statement of Common Ground in 2018 and has continued to meet and evolve agreed work to progress this further since.

3.8.4 Table 3.8 summarises the key methods and outputs which have been progressed in relation to meeting the Duty to Cooperate in preparing the Submission draft Local Plan Review in relation to Green Infrastructure.

**Table 3.8: Green Infrastructure Cooperation**

<b>Authorities</b>	<b>Cooperation</b>	<b>Outputs</b>
Gatwick Diamond Authorities	Joint commissioning and adoption of the Gatwick Diamond Local Strategic Statement.	Joint strategic Priority Theme across the authorities for “6. High Quality Natural Environment, Countryside and Landscape”.
High Weald AONB Partnership (see Table 1.1 for membership)	Preparation, Adoption and Maintenance of the High Weald AONB Management Plan	High Weald AONB Management Plan 2019 – 2024
Ashdown Forest Working Group (see Table 1.1 for membership)	Joint working across the wider area to address the strategic cross boundary issue of air quality impacts on the Ashdown Forest Special Area of Conservation (SAC) arising from traffic associated with new development.	Ashdown Forest Statement of Common Ground (April 2018)
Crawley, Mid Sussex and Horsham Districts	Meetings as Northern West Sussex Authorities to discuss strategic emerging matters, evidence base and Local Plan Reviews.	NWS Statement of Common Ground.
Crawley and Horsham District	Joint commission of Eco-Serv GIS to understand opportunities and demands on the borough and district’s joining Green Infrastructure assets.	Eco-Serv GIS (March 2019 and January 2020)
Crawley, Mid Sussex, Reigate and Banstead, Mole Valley, Horsham Districts, Horley Town, and Surrey and West Sussex Counties	Participation as part of Gatwick Greenspace Partnership Authorities.	Ongoing funding secured for delivery of enhancement projects.
West Sussex and East Sussex Authorities	Participation as a member of the Steering Group for the Sussex Biodiversity Record Centre.	Updated Local Wildlife Site data
Crawley Borough and Horsham District	Joint commissioning of the Eco-Serv Report considering the multi-functionality and benefits of Green Infrastructure.	Eco-Serv Report 2019/2020

Authorities	Cooperation	Outputs
Crawley Borough, Horsham District and West Sussex County	On-going discussions in relation to Strategic Site proposals: including Urban Design expertise and Open Space evidence.	Jointly Signed PPA for pre-application discussions for first phase of Homes England proposals.  CBC comments on Submitted Environmental Impact Assessment Scoping Opinion for development on land west of Ifield.  Crawley Submission draft Local Plan.  CBC/HDC Statement of Common Ground (in preparation).

### Outstanding Issues & Ongoing Cooperation

- Action: Crawley Borough Council will support securing Biodiversity Net Gain and Nature Recovery, including through enhancements within the identified Biodiversity Opportunity Areas, in the borough and identify ways for delivering these through the Review of the Green Infrastructure SPD.**
- Action: Ongoing discussions into maintaining linkages from the existing neighbourhoods into the countryside as part of the Horsham District Local Plan evidence, policy preparation, consultation and examination in relation to Homes England’s strategic development proposals for land to the west of Ifield to form a new neighbourhood for Crawley.**
- Action: Ongoing discussions as part of the PPA and development management processes on any masterplans, planning applications for Homes England’s strategic development proposals for land to the west of Ifield to form a new neighbourhood for Crawley to maximise Green Infrastructure connections and enhancements along with securing Biodiversity Net Gain.**
- Action: Ongoing discussions are necessary between Crawley and its adjoining authorities and the County Council in relation to ensuring Crawley maintains its character as a compact town in a countryside setting with good accessibility and visual connectivity to the countryside and landscapes beyond the borough, in relation to any potential further urban extensions to the borough for the medium- to long-term, beyond the Plan period.**

**Appendix A: List of Prescribed Bodies and Statutory Consultees**

Duty to Cooperate Prescribed Bodies	Local Plan Statutory Consultees
<p><b>County Council:</b> West Sussex County Council</p>	<p><b>County Council:</b> West Sussex County Council</p>
<p><b>Adjoining Authorities:</b> Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate and Banstead Borough Council Tandridge District Council Surrey County Council</p>	<p><b>Adjoining Authorities:</b> Horsham District Council Mid Sussex District Council Mole Valley District Council Reigate and Banstead Borough Council Tandridge District Council Surrey County Council</p>
<p><b>Other Gatwick Diamond Authorities:</b> Epsom and Ewell District Council</p>	<p><b>Official Agencies:</b> Environment Agency Highways England Historic England Natural England Network Rail Infrastructure Limited Local Police Authority Strategic Health Authority Communications Water and Energy Providers Homes and Communities Agency</p>
<p><b>West Sussex Coastal Authorities:</b> Adur and Worthing Councils Arun District Council Chichester District Council South Downs National Park Authority</p>	
<p><b>Other Coastal Housing Market Area Authorities:</b> Brighton and Hove City Council Lewes District Council</p>	
<p><b>Other East Sussex Authorities:</b> Wealden District Council</p>	
<p><b>Other Surrey Authorities:</b> Guilford District Council Waverley Borough Council</p>	
<p><b>Other Prescribed Bodies:</b> Environment Agency Highways England Historic England Natural England</p>	
<p><b>Local Economic Partnership:</b> Coast to Capital LEP</p>	

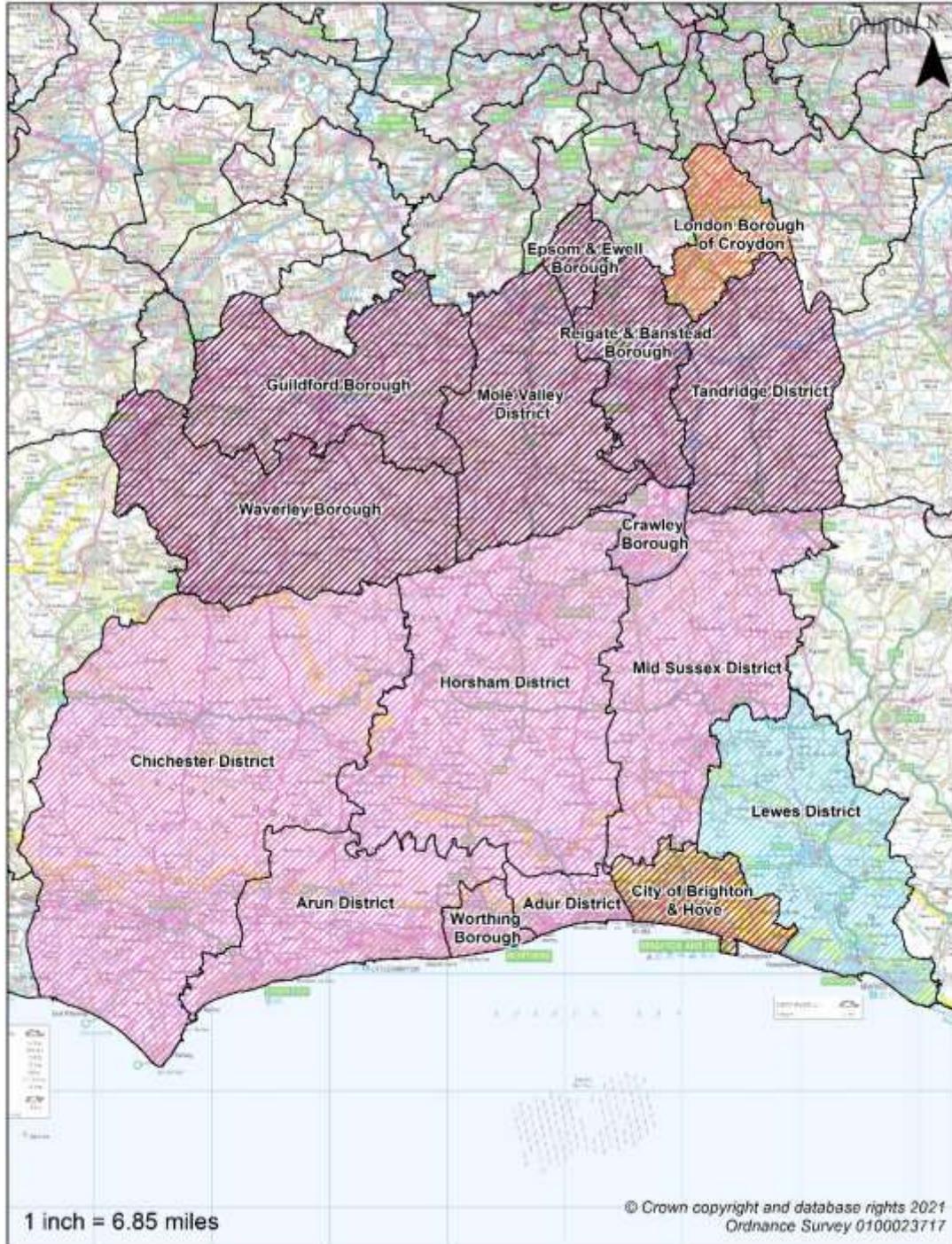
**Appendix B: Maps**

- i. Local Authority Areas
- ii. Gatwick Diamond Local Authorities
- iii. Housing Market Areas
- iv. West Sussex and Greater Brighton Strategic Planning Board Authorities
- v. Coast to Capital Local Enterprise Partnership Local Authority Areas
- vi. Ashdown Forest Working Group Authorities
- vii. Gatwick Officer Group Authorities

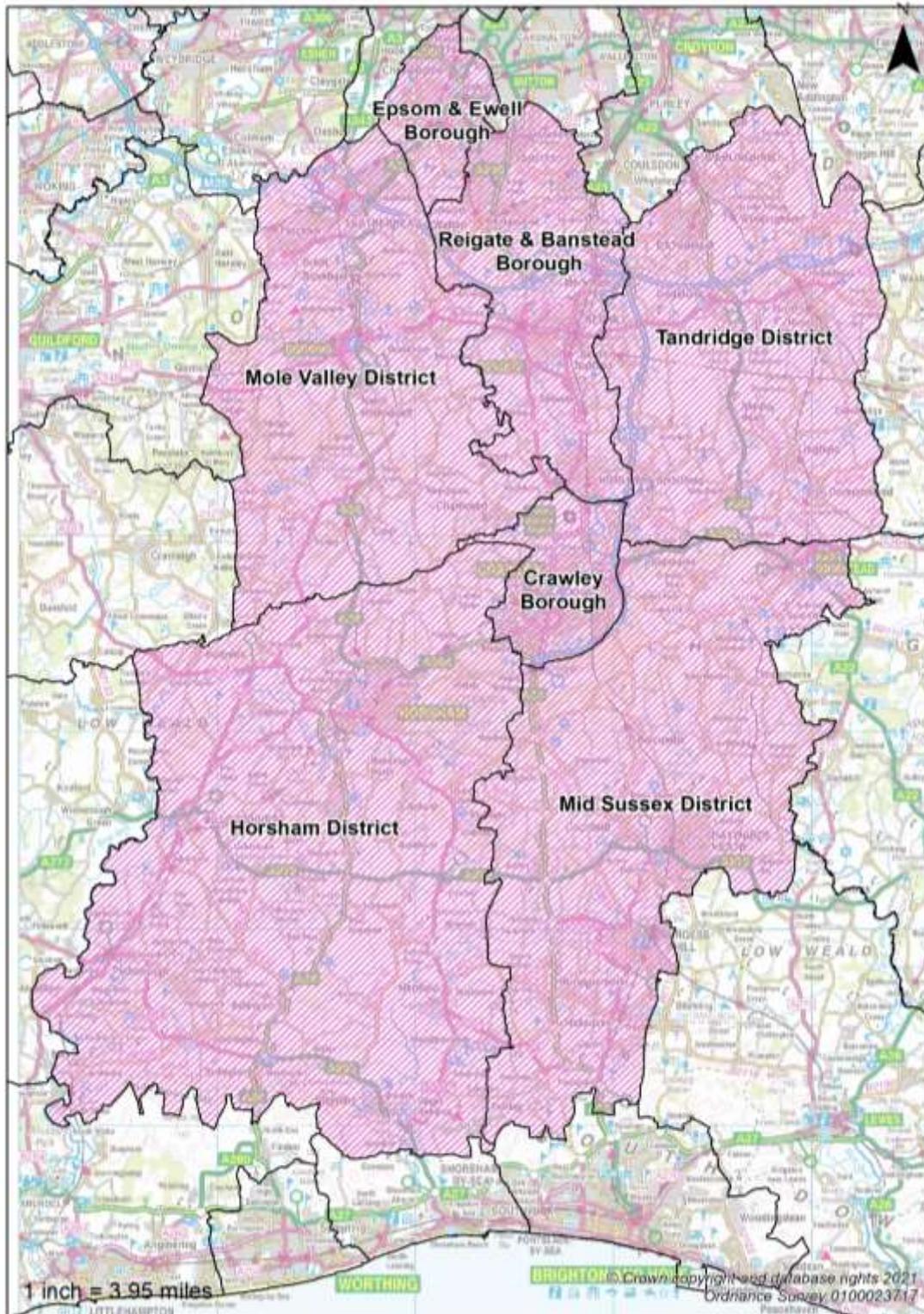
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## LOCAL AUTHORITY AREAS

- |  |  |
|--|--|
|  West Sussex County |  Brighton & Hove Unitary  |
|  East Sussex County |  Greater London Authority |
|  Surrey County      |  |

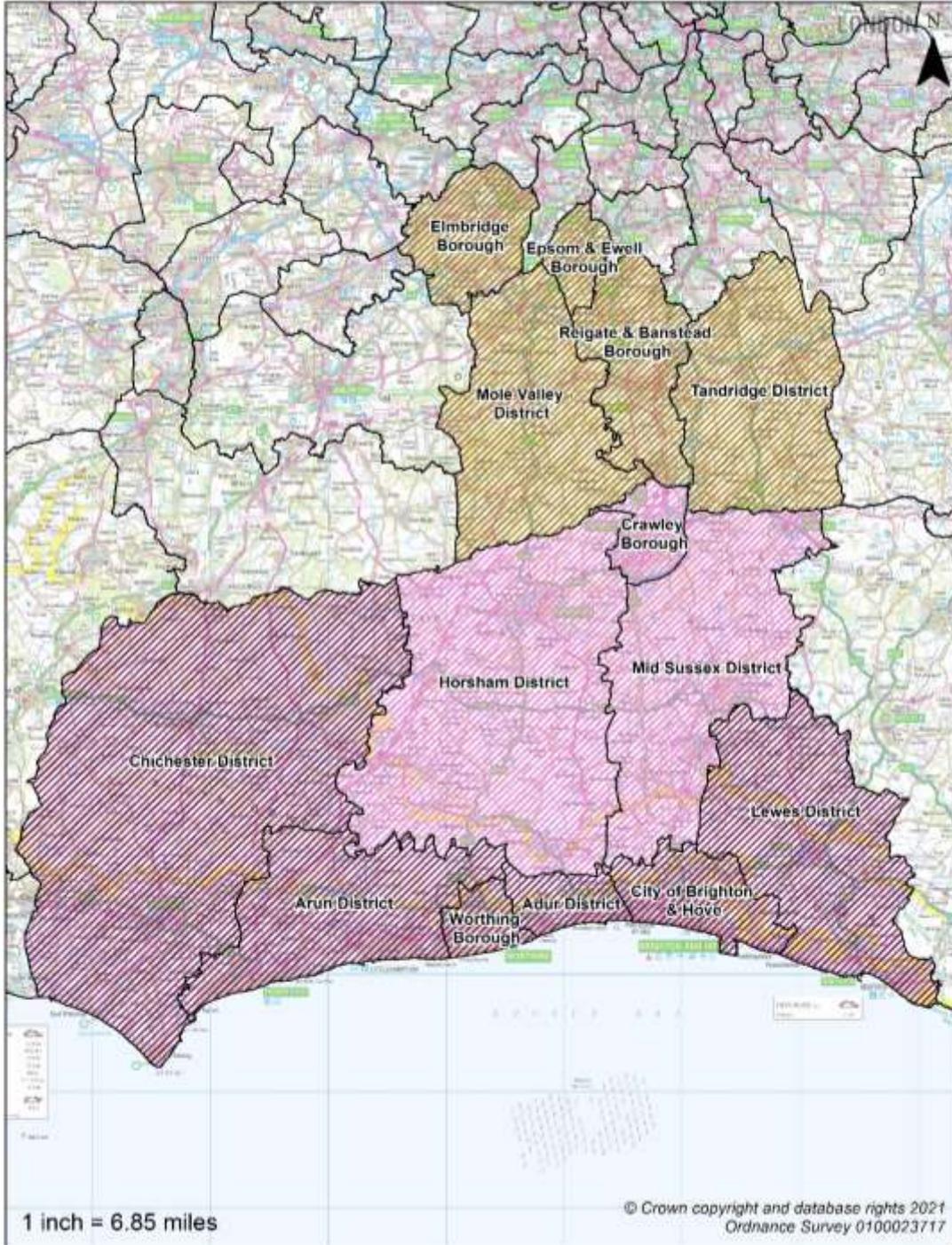


## GATWICK DIAMOND LOCAL AUTHORITIES

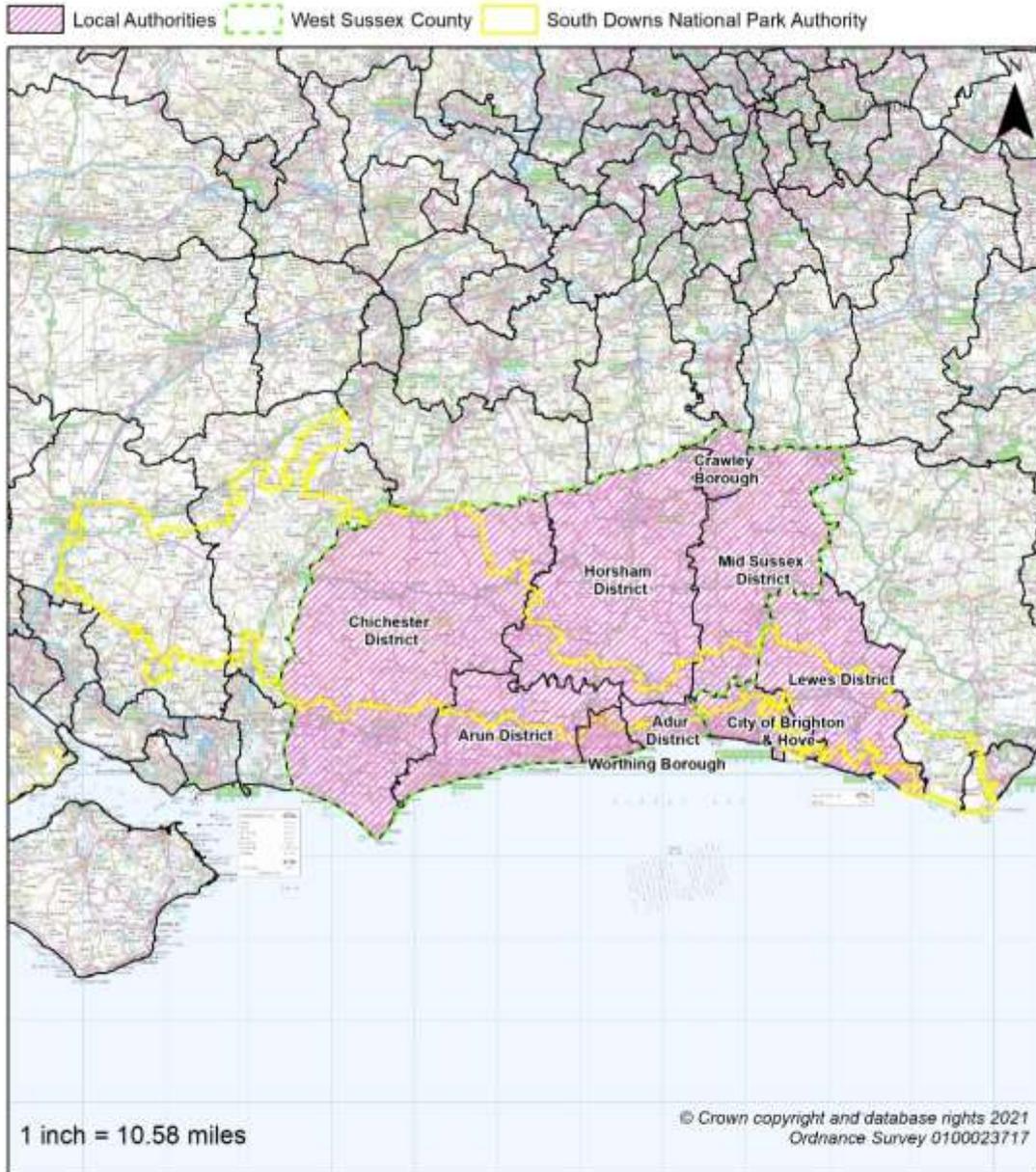


## HOUSING MARKET AREAS

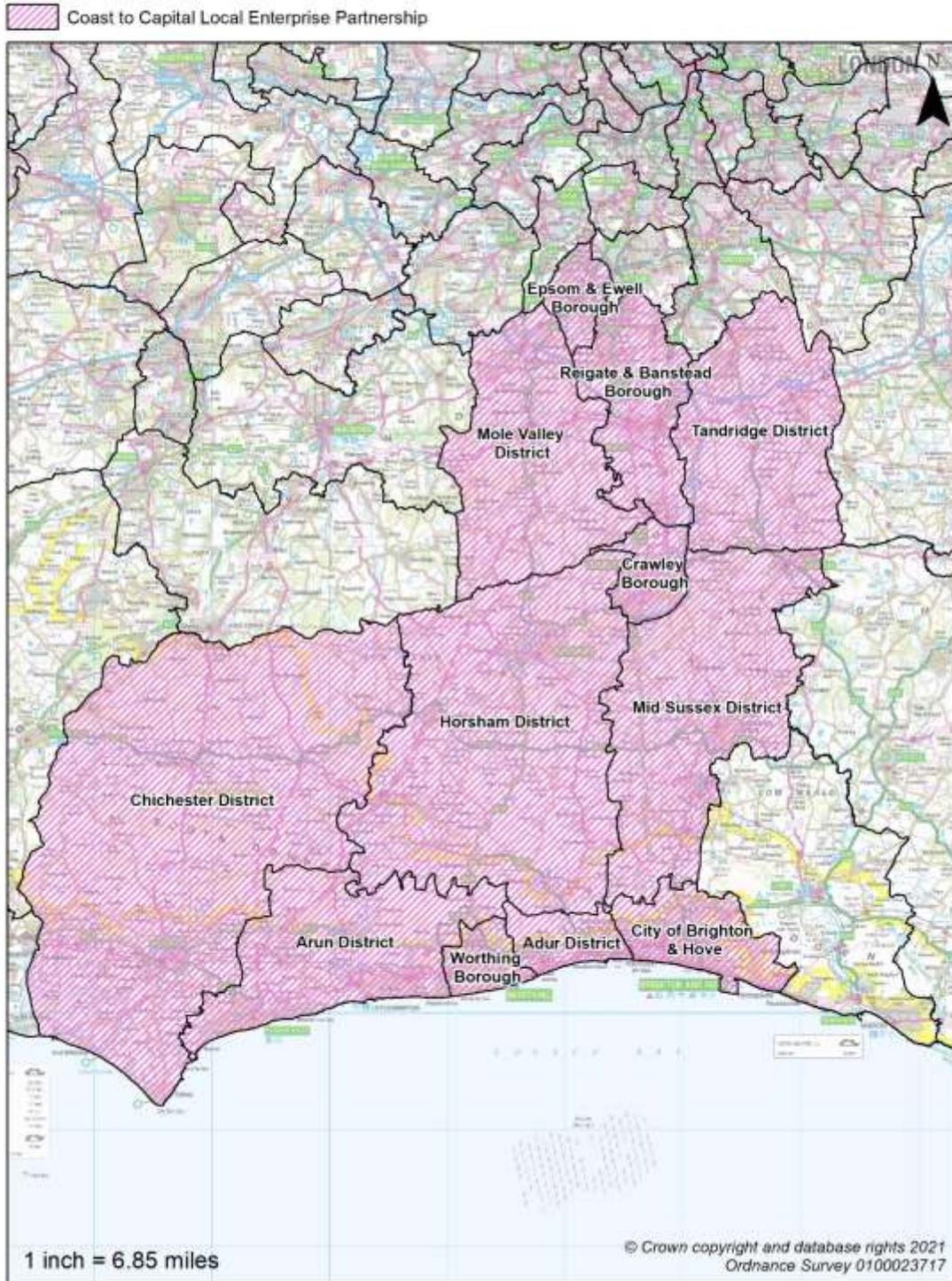
-  Northern West Sussex Housing Market Area
-  Coastal West Sussex Housing Market Area
-  East Surrey Housing Market Area



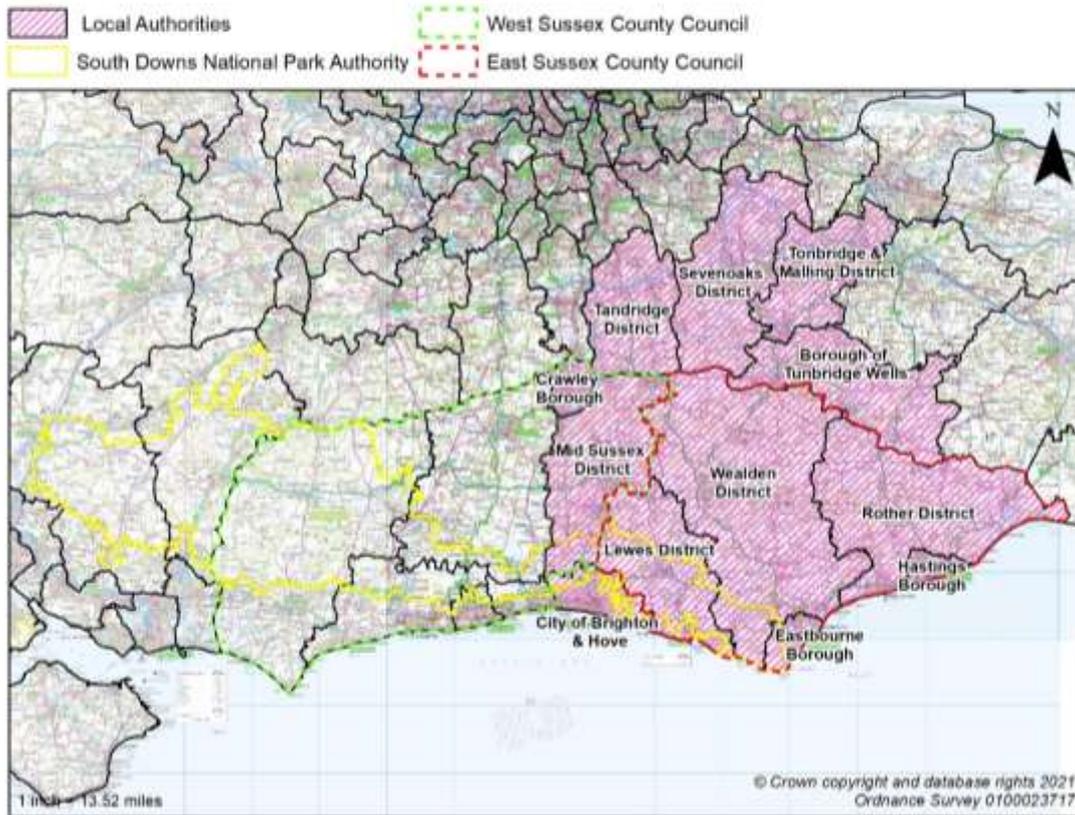
## WEST SUSSEX AND GREATER BRIGHTON STRATEGIC PLANNING BOARD



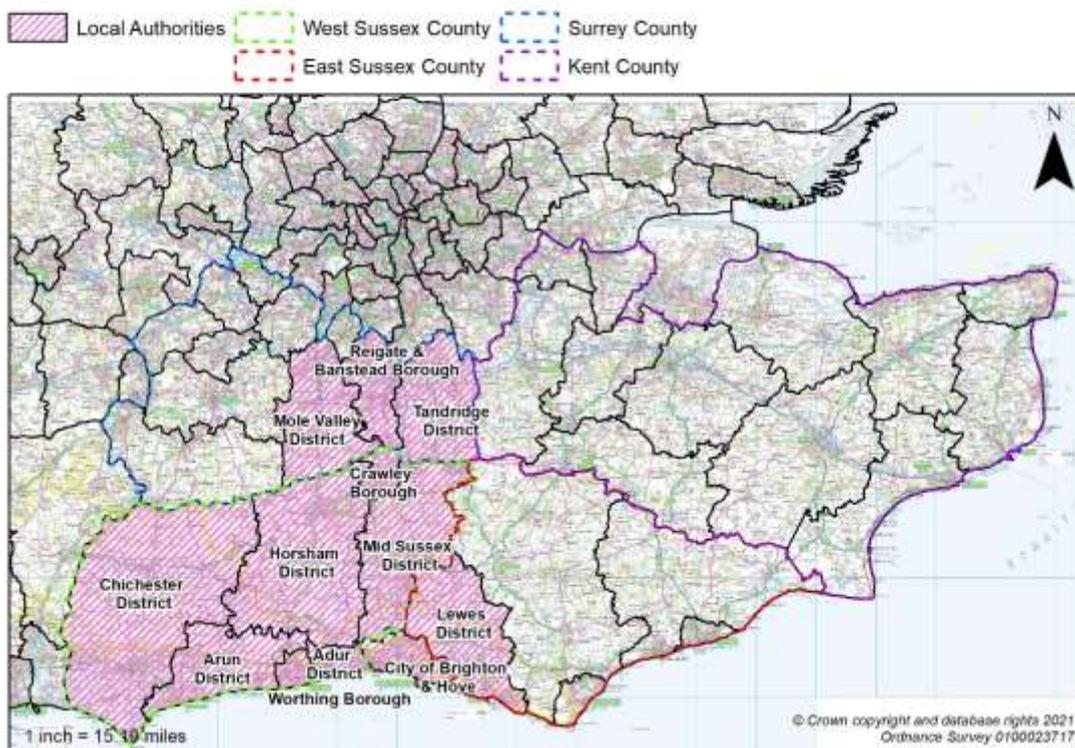
## COAST TO CAPITAL LOCAL ENTERPRISE PARTNERSHIP LOCAL AUTHORITY AREAS



## ASHDOWN FOREST WORKING GROUP



## GATWICK OFFICER GROUP



**Appendix C: Strategic Joint Working Mechanisms**

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Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
Coast to Capital Local Enterprise Partnership		Chairman & Vice Chairman Private Sector – Business Representatives Public Sector – Leader Representatives Higher/Further Education Representative	Coast to Capital extends from London to the South East Coast. The role of Local Enterprise Partnerships is to re-balance the economy and to promote private sector employment growth. The LEP vision is to create an outward facing, high performing international business economy, with a reputation for being a good place to do business. Business and economic performance will be transformed so the area can compete in the global marketplace.		
Gatwick Diamond	Gatwick Diamond Members	Councillors: Portfolio Holders for Planning at Epsom and Ewell, Crawley, Horsham, Mid Sussex, Mole Valley, Reigate and Banstead, Surrey, Tandridge, West Sussex Councils.	<ul style="list-style-type: none"> <li>• Memorandum of Understanding.</li> <li>• Gatwick 2030 Infrastructure Report</li> <li>• Local Strategic Statement.</li> </ul>	27 July 2016 26 June 2017	<ul style="list-style-type: none"> <li>→ Gatwick 2030 Infrastructure Report (2016)</li> <li>→ Memorandum of Understanding (2016)</li> <li>→ Gatwick Diamond Local Strategic Statement (2017)</li> <li>→ Joint Response to the London Plan EiP</li> </ul>
	Gatwick Diamond Local Authorities Officer Group	Planning Officers from Epsom and Ewell, Crawley, Horsham, Mid Sussex, Mole Valley, Reigate and	<ul style="list-style-type: none"> <li>• Preparation of Memorandum of Understanding and Local Strategic Statement.</li> </ul>	28 April 2016 8 June 2016 26 July 2016 28 September 2016 6 December 2016	<ul style="list-style-type: none"> <li>→ Gatwick Diamond Local Strategic Statement (2017)</li> <li>→ Joint Response to and Representation at the London Plan EiP (6 November 2018 and 25 January 2019)</li> </ul>

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Banstead, Surrey, Tandridge, West Sussex Councils.	<ul style="list-style-type: none"> <li>Supporting preparation of Local Plans.</li> <li>Sharing of information.</li> <li>Considering the implications of the London Plan, Ashdown Forest, Coast to Capital LEP and Gatwick Airport.</li> <li>Understanding critical cross boundary and strategic issues.</li> </ul>	2 May 2017 9 November 2017 13 February 2018 8 March 2018 23 May 2018 18 July 2018 3 October 2018 8 January 2019 3 June 2019 2 December 2019	
West Sussex and Greater Brighton	Leaders and Chief Executives	Councillors: Leaders of West Sussex District and County Councils	Duty to Cooperate is a standing item on the agenda for these meetings.	14 July 2017 17 November 2017 26 January 2018 18 April 2018 25 May 2018 25 July 2018 12 October 2018 9 November 2018 23 November 2018 23 January 2019 8 March 2019 25 July 2019 31 October 2019 27 January 2020 24 February 2020 23 October 2020 19 November 2020	
	Strategic Planning Board	Councillors: Portfolio Holders for Planning at West Sussex and Greater Brighton	Local Strategic Statement 3: <ul style="list-style-type: none"> <li>Housing;</li> <li>Economic Growth;</li> </ul>	4 September 2017 29 January 2018 23 July 2018 26 November 2018	→ CBC joined the Coastal West Sussex and Greater Brighton Strategic Planning Board to merge the West Sussex Joint Planning Board into a

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		District and County Councils Chief Planning Officers at West Sussex and Greater Brighton District and County Councils	<ul style="list-style-type: none"> <li>• Landscape Character Assessment;</li> <li>• SEA/SA;</li> <li>• Infrastructure.</li> </ul>	18 February 2019 12 September 2019 25 March 2020 9 October 2020 31 March 2021	<p>single joint Board: West Sussex and Greater Brighton Strategic Planning Board.</p> <p>→ Joint Response to MHCLG consultation on Changes to the Current Planning System.</p> <p>→ Joint Response to MHCLG consultation on the White Paper: Planning for the Future.</p> <p>→ Agreement to undertake work and evidence gathering to support preparations for the West Sussex and Greater Brighton Local Strategic Statement (LSS3)</p>
	West Sussex and Greater Brighton Planning Officer Group	Chief and Senior Planning Officers at West Sussex and Greater Brighton District and County Councils	<p>Local Strategic Statement 3:</p> <ul style="list-style-type: none"> <li>• Housing;</li> <li>• Economic Growth;</li> <li>• Landscape Character Assessment;</li> <li>• SEA/SA;</li> <li>• Infrastructure.</li> </ul>	6 January 2017 20 March 2017 8 May 2017 1 September 2017 20 November 2017 15 January 2018 30 April 2018 16 July 2018 6 August 2018 12 November 2018 14 January 2019 20 May 2019 2 September 2019 22 June 2020 23 September 2020 5 February 2021	<p>→ Defining the HMA and FEMA Report (2017) GL Hearn</p> <p>→ Joint DCLG Bid Submission</p> <p>→ Commissioning of strategic evidence</p> <p>→ Draft Statement of Common Ground (in preparation)</p>

Crawley Borough Local Plan 2021 – 2037  
Draft Duty to Cooperate Statement, March 2021

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
	Adur/ Crawley/ Horsham/ Worthing Planning Officer Meeting	Local Plan Lead Planning Policy Officers at the four authorities	To discuss Duty to Cooperate as part of Local Plan Reviews and the timetable and progression of LSS3.	9 November 2020	<ul style="list-style-type: none"> <li>→ Shared understanding of Local Plan Reviews, approaches to DtC and timetables for progression.</li> <li>→ Agreement for urgency of progression with West Sussex &amp; Greater Brighton LSS3.</li> </ul>
	Crawley/Worthing Planning Officer Meeting	Local Plan Lead Planning Policy Officers at the two authorities	To discuss the respective Local Plan Reviews and Duty to Cooperate.	18 March 2021	<ul style="list-style-type: none"> <li>→ Shared understanding of Local Plan Reviews, approaches to DtC and timetables for progression.</li> <li>→ Agreement for urgency of progression with West Sussex &amp; Greater Brighton SoCG.</li> <li>→ CBC letter responding to Worthing Local Plan DtC Request.</li> </ul>
	Crawley/Arun Planning Officer Meeting	Local Plan Lead Planning Policy Officers at the two authorities	To discuss the respective Local Plan positions and Duty to Cooperate.	24 March 2021	<ul style="list-style-type: none"> <li>→ Shared understanding of Local Plan Reviews, approaches to DtC and timetables for progression.</li> <li>→ Agreement for urgency of progression with West Sussex &amp; Greater Brighton SoCG.</li> <li>→ Draft Statement of Common Ground (in preparation)</li> </ul>
	West Sussex Planning Policy Officers Group	Local Plan Lead Planning Policy Officers at West Sussex District and County Councils	<ul style="list-style-type: none"> <li>• Duty to Cooperate is a standard item on the agenda.</li> <li>• Local Plan Timetables and progress.</li> <li>• Evidence Base Updates.</li> <li>• Information Sharing.</li> </ul>	<ul style="list-style-type: none"> <li>7 June 2016</li> <li>6 September 2016</li> <li>13 December 2016</li> <li>8 March 2017</li> <li>14 June 2017</li> <li>13 September 2017</li> <li>13 December 2017</li> <li>30 January 2018</li> <li>11 April 2018</li> <li>10 July 2018</li> </ul>	<ul style="list-style-type: none"> <li>→ West Sussex Joint Statement of Common Ground: (April 2020): agreed approach to county wide planning issues</li> <li>→ Shared understanding of Local Plan Reviews, approaches to DtC and timetables for progression.</li> <li>→ County-wide Planning Issues: development monitoring; education; minerals and waste; flooding and</li> </ul>

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				9 October 2018 9 January 2019 3 April 2019 22 April 2020 15 July 2020 21 October 2020 20 January 2021	water quality; parking standards; transport modelling; infrastructure contributions; biodiversity/nature conservation.
	West Sussex County Monitoring and Infrastructure Group	Lead Planning Monitoring and Infrastructure Officers at West Sussex District and County Councils	<ul style="list-style-type: none"> <li>Shared approach to monitoring of development delivery across the county.</li> <li>Discuss the Infrastructure Funding Statement.</li> </ul>	28 March 2017 27 March 2019 26 November 2019 15 October 2020	→ Agreement for WSCC Monitoring Officer to undertake development commencement and completion surveys and compile data on behalf of the borough council. → Consistent approach to monitoring development across the county.
Northern West Sussex Authorities	Northern West Sussex Planning Officers	Planning Officers from Crawley Borough Council, Horsham District Council, Mid Sussex District Council and West Sussex County Council	<ul style="list-style-type: none"> <li>Shared understanding of cross-boundary issues.</li> <li>Duty to Cooperate Position Statement: Housing Numbers and Economic Growth.</li> <li>Travellers.</li> <li>SHMA</li> <li>Economic Growth Assessment</li> <li>Water and Waste Water Infrastructure</li> </ul>	25 August 2016 5 July 2017 25 July 2017 26 July 2017 22 August 2017 13 December 2017 26 February 2018 12 July 2018 6 November 2018 14 November 2018 24 January 2019 27 September 2019 21 October 2019 19 December 2019 26 January 2021	→ Horsham District Planning Framework (2015) → Duty to Cooperate Position Statement (March 2016) → Statement of Common Ground for Mid Sussex District Plan (2017) → Duty to Cooperate Updated Position Statement (2017) → Mid Sussex District Plan (2018) → Statement of Common Ground (May/June 2020)
			→ Economic Growth Assessment → Draft Shared with Reigate and Banstead.	26 February 2018 24 January 2019 7 March 2019 9 May 2019	→ Joint Northern West Sussex Economic Growth Assessment (Lichfields, 2020) → Crawley Focused EGA Update (Lichfields, 2020)

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
			→ EGA Crawley-focused update letter of engagement shared.	22 May 2019 24 September 2019 4 November 2019 3 June 2020 9 July 2020	
			→ Strategic Housing Market Assessment (Crawley and Horsham Updates)	30 August 2016 8 September 2016 14 October 2016 5 February 2019 1 March 2019 25 July 2019	→ Joint Housing Market Mix Study (Chilmark, 2016) → Joint Starter Homes Study (Chilmark, 2016) → Joint Strategic Housing Market Assessment (Iceni, 2019) for Crawley & Horsham in the context of NWS HMA
Sussex Wide	Sussex Environmental Health Officers Groups	East & West Sussex District and County Councils	<ul style="list-style-type: none"> <li>• Air Quality Steering Group</li> <li>• Sussex Air Quality and Noise Seminar</li> </ul>	27 March 2018  2 May 2018	→ Air Quality and Emissions Guidance for Sussex (2013) Sussex Air → Planning and Noise Advice Document: Sussex (2013) East and West Sussex Authorities → West Sussex Energy Study → Sussex Air Quality and Noise Seminar CBC Presentation
	Biodiversity Record Centre	East & West Sussex District and County Councils	<ul style="list-style-type: none"> <li>• Biodiversity</li> </ul>	27 June 2017 16 May 2018 12 September 2018 7 May 2019 22 October 2019	→ SBRC datasets that meet Local Authority's needs.
Kent, Surrey and Sussex Wide	AONB Joint Advisory Committee	Ashford Borough Council; Crawley Borough Council; East Sussex County Council; Hastings Borough Council;	<ul style="list-style-type: none"> <li>• High Weald AONB issues</li> </ul>	25 November 2020 31 March 2021	→ High Weald Management Plan 2019 – 2024 → High Weald Design Guide (2020)

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Horsham District Council; Kent County Council; Mid Sussex District Council; Rother District Council; Sevenoaks District Council; Surrey County Council; Tandridge District Council; Tonbridge and Malling Borough Council; Tunbridge Wells Borough Council; Wealden District Council; West Sussex District Council			
	AONB Officer Steering Group	As above	<ul style="list-style-type: none"> <li>• High Weald AONB issues.</li> </ul>	10 February 2021	→ High Weald AONB Management Plan → High Weald Design Guide (2020)
	Ashdown Forest Local Authorities Group	Natural England; Brighton and Hove City Council, Crawley Borough Council; Eastbourne Borough Council; East Sussex County Council; Hastings Borough Council; Horsham District Council; Lewes District Council; Mid Sussex District Council; Rother District	<ul style="list-style-type: none"> <li>• Ashdown Forest SAC and SPA</li> <li>• Habitats Regulations Assessment</li> <li>• Cumulative Impacts</li> <li>• Transport Modelling</li> <li>• Air Quality</li> <li>• Monitoring</li> </ul>	7 February 2018 23 February 2018 (Chief Executives) 12 April 2018 4 June 2018 29 November 2018 13 February 2019 20 February 2020 2 July 2020	→ Ashdown Forest Statement of Common Ground

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Council; Sevenoaks District Council; South Down National Park; Tandridge District Council; Tonbridge and Malling Borough Council; Tunbridge Wells Borough Council; Wealden District Council; West Sussex County Council			
Adjoining Authorities (1-1)	Horsham/ Crawley	Portfolio Holder Member and Planning Officer Leads from Crawley Borough Council and Horsham District Council	<ul style="list-style-type: none"> <li>Local Plan Reviews</li> <li>Strategic and Cross-Boundary issues</li> </ul>		→ Horsham District Planning Framework reference to meeting HMA unmet needs. → Statement of Common Ground (in preparation)
		Planning Officer Leads from Crawley Borough Council and Horsham District Council	<ul style="list-style-type: none"> <li>Local Plan Reviews and emerging Policies</li> <li>Strategic objectively assessed needs.</li> <li>Strategic Site(s)</li> <li>Transport Modelling</li> <li>HRA/Water Resources</li> </ul>	13 June 2016 20 March 2019 27 September 2019 5 May 2020 20 May 2020 28 May 2020 2 September 2020 24 September 2020 15 October 2020 12 November 2020 26 November 2020 1 December 2020 17 December 2020 7 January 2021 25 January 2021 28 January 2021	→ Crawley submission Local Plan (2021) → Statement of Common Ground → Comparison Assessment of Transport Modelling Studies → Joint Commission of Water Neutrality Study

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				18 February 2021 18 March 2021	
	Crawley/ Horsham/ West Sussex	Key officers from Crawley Borough Council, Horsham District Council and West Sussex County Council at a variety of different meetings for differing levels of discussion from strategic to technical detail.	West of Ifield/West of Crawley (with and without Homes England). On-going discussions in relation to Strategic Site proposals, including: <ul style="list-style-type: none"> <li>• Needs and policy requirements;</li> <li>• Landscape Character and Urban Design expertise;</li> <li>• Infrastructure capacity;</li> <li>• Shared coordination of Transport Modelling and Open Space evidence;</li> <li>• approach to Crawley Western Link Road;</li> <li>• blended housing mix and affordable housing;</li> <li>• unmet education needs;</li> <li>• shared findings related to Habitats Regulations Assessment and shared commissioning of additional work in relation to water abstraction and water neutrality.</li> </ul>	13 June 2016 19 July 2016 10 January 2017 14 February 2017 21 March 2017 11 July 2017 19 September 2017 17 October 2017 6 November 2017 23 January 2018 28 March 2018 29 May 2018 24 July 2018 25 September 2018 5 November 2018 19 November 2018 14 December 2018 25 February 2019 28 February 2019 8 March 2019 24 April 2019 16 May 2019 13 June 2019 26 June 2019 29 July 2019 4 September 2019 10 October 2019 20 January 2020 12 May 2020 20 May 2020 1 June 2020	<p>→Understanding of potential strategic site and necessary infrastructure and planning policy considerations should it progress through the Horsham District Local Plan process or be submitted as a planning application.</p> <p>→Horsham District Plan Review: Reg. 18 including West of Crawley potential strategic site for up to 10,000 new homes over the next 30 years as an option for consultation.</p> <p>→Crawley submission Local Plan (2021)</p> <p>→Homes England early pre-application engagement commenced on the promotion of West of Crawley potential strategic site for up to 10,000 new homes over the next 30 years in the form of three new neighbourhoods for Crawley, and including neighbourhood centres, infrastructure provision including western link road, schools and health facilities and employment.</p> <p>→Signed Joint Planning Performance Agreement</p> <p>→Responses to Scoping Opinion</p> <p>→Commencement of Facilities Planning Model with Sport England</p>

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				2 June 2020 5 June 2020 24 June 2020 3 August 2020 4 August 2020 9 September 2020 10 September 2020 10 November 2020 16 November 2020 3 December 2020 8 December 2020 14 December 2020 17 December 2020 21 January 2021 29 January 2021 4 March 2021 18 March 2021	
	Mid Sussex/Crawley	Portfolio Holder Member and Planning Officer Leads from Crawley Borough & Mid Sussex District Councils	<ul style="list-style-type: none"> <li>Housing Development potential adjacent to Crawley</li> <li>Neighbourhood Plans</li> </ul>	11 December 2017	→ Crawley formally joined West Sussex and Greater Brighton Strategic Planning Board
		Planning Officer Leads from Crawley Borough & Mid Sussex District Councils	<ul style="list-style-type: none"> <li>Mid Sussex District Plan.</li> </ul>	22 June 2016 29 July 2016 8 November 2016 1 December 2016 12 January 2017 6 March 2017 30 March 2017 6 April 2017	→ Mid Sussex Statement of Common Ground → NWS Position Statement Update. → Mid Sussex District Plan meeting Crawley's outstanding unmet housing needs.

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
	Reigate & Banstead/ Crawley	Planning Officer Leads from Crawley Borough Council and Reigate & Banstead Borough Council	<ul style="list-style-type: none"> <li>• Reigate &amp; Banstead Development Management Plan.</li> <li>• Strategic Employment Site.</li> <li>• Retail.</li> <li>• Economic Growth Assessments and evidence studies.</li> <li>• Gypsy, Travellers and Travelling Showpeople Needs.</li> <li>• Transport.</li> </ul>	22 April 2016 10 February 2017 27 November 2017 26 February 2018 8 November 2018 6 October 2020 19 October 2020 7 January 2021	→ RBBC adopted Development Management Plan and allocation of Horley Strategic Employment Site. → Statement of Common Ground (February 2021)
	Crawley/Tandridge	Planning Officer Leads from Crawley Borough Council and Tandridge District Council	<ul style="list-style-type: none"> <li>• Local Plan Updates, timetables and strategies.</li> <li>• Housing need and constraints:               <ul style="list-style-type: none"> <li>- Green Belt;</li> <li>- Gatwick Airport;</li> <li>- Noise and Flooding;</li> <li>- Transport modelling</li> </ul> </li> <li>• London pressures.</li> <li>• Gypsy &amp; Traveller Needs.</li> </ul>	6 February 2018 14 June 2018 30 March 2021	→ Statement of Common Ground (December 2018)
	Crawley/Mole Valley	Planning Officer Leads from Crawley Borough Council and Mole Valley District Council	<ul style="list-style-type: none"> <li>• Local Plan Updates, timetables and strategies.</li> <li>• Housing and employment needs and constraints:               <ul style="list-style-type: none"> <li>- Green Belt;</li> <li>- Gatwick Airport;</li> </ul> </li> </ul>	16 April 2020 17 November 2020	→ Statement of Common Ground (January 2021)

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
			<ul style="list-style-type: none"> <li>- Noise and Flooding;</li> <li>- Transport modelling</li> <li>• Gypsy and Traveller Needs.</li> </ul>		
Infrastructure Providers/ Stakeholder Agencies	Environment Agency (EA)		<ul style="list-style-type: none"> <li>• SFRA.</li> <li>• Water Cycle Study.</li> <li>• Flood Risk Management and Reduction at Gatwick Airport.</li> </ul>		<ul style="list-style-type: none"> <li>→ Strategic Flood Risk Assessment Update (2020)</li> <li>→ Gatwick Sub-Region Water Cycle Study (2020)</li> <li>→ Flood Risk Management and Reduction at Gatwick Airport</li> </ul>
	West Sussex County Council	Crawley Borough Council and West Sussex County Council	<ul style="list-style-type: none"> <li>• To consider infrastructure requirements including education, care, public health</li> <li>• To secure greater coverage of full fibre broadband infrastructure</li> <li>• To consider Minerals and Waste</li> </ul>	12 December 2016 30 August 2018 12 September 2019 30 September 2019 4 March 2020	<ul style="list-style-type: none"> <li>→ Statement of Common Ground (April 2020)</li> <li>→ Crawley draft Infrastructure Plan (January 2021)</li> </ul>
	West Sussex County Council (and Highways England)	Crawley Borough Council and West Sussex County Council	<ul style="list-style-type: none"> <li>• To jointly commission and approve the Crawley Local Plan Transport Study Update</li> <li>• To agree approach to strategic transport needs including approach to Crawley Wester Link Road</li> </ul>	12 December 2016 12 December 2019 23 March 2020 15 April 2020 15 May 2020 1 June 2020 16 July 2020 4 August 2020 30 September 2020 28 October 2020 1 December 2020 7 January 2021	<ul style="list-style-type: none"> <li>→ Shared Tender Brief with Highways England &amp; Secured Feedback (2 January, 17 January and 21 January 2020)</li> <li>→ Crawley draft Infrastructure Plan (January 2021)</li> <li>→ Draft Crawley Transport Modelling Report</li> <li>→ Crawley and in combination traffic Data input into HRA</li> </ul>

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				18 January 2021	
	Arun Valley Potential New Rail Stations	Network Rail, Department for Transport, GTR, Coast to Capital LEP, West Sussex County Council, Horsham District Council and Crawley Borough Council	<ul style="list-style-type: none"> <li>To consider the opportunities and impacts of potential new rail stations between Crawley and Horsham; including Kilnwood Vale and North Horsham proposals.</li> <li>Timetable modelling study</li> </ul>	23 April 2018 25 May 2018 5 June 2018 19 June 2018 16 July 2018 31 July 2018 9 August 2018 10 May 2019 14 October 2019 4 February 2020 7 September 2020 14 October 2020 19 November 2020	→Draft Network Rail Timetable Study →WSP Timetable Study: Arun Valley Independent Review Final Summary Report (received 11 December 2020)
	Thames Water		<ul style="list-style-type: none"> <li>Wastewater Treatment Works and sewage capacity and implications of upgrades and improvements to technology alongside the changing development levels in the Local Plan.</li> </ul>	25 August 2016 6 November 2018	→Infrastructure Plan – position statement
	Gatwick Water Cycle Study	Crawley, Horsham, Mid Sussex, Reigate and Banstead, Environment Agency, East Sutton and Surrey Water, Thames Water, Southern Water, South East Water	<ul style="list-style-type: none"> <li>River Catchment Management.</li> <li>River Flooding.</li> <li>Water Supply Capacity.</li> <li>Surface Water Drainage.</li> <li>Wastewater.</li> </ul>	19 November 2019 29 November 2019 30 March 2020	→ Gatwick Water Cycle Study (2020) → Gatwick Water Cycle Study Crawley Addendum (2020)

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
	Sussex North Water Neutrality Assessment	Crawley, Chichester, Horsham, Natural England, Environment Agency, Southern Water (input from SDNPA, Arun, Mid Sussex and Waverley)	<ul style="list-style-type: none"> <li>Assessing measures and technical feasibility to achieve water neutrality.</li> <li>Circulation of Brief</li> <li>Request of input from other authorities.</li> </ul>	30 November 2020 16 December 2020 17 December	→ Joint Water Neutrality Study (2021) → Ongoing
	Habitat Regulation Assessment with Natural England	Planning Policy Officers from Crawley Borough Council and Natural England, and consultants commissioned to prepare the Crawley HRA	<ul style="list-style-type: none"> <li>Hardham Water Abstraction</li> <li>Cumulative Impacts</li> <li>Water Neutrality</li> <li>Water Quality</li> </ul>	23 November 2020	→ Joint Water Neutrality Study (2021) → HRA (2021)
Gatwick Greenspace Partnership	Gatwick Greenspace Partnership	Sussex Wildlife Trust, Crawley, Horsham, Reigate and Banstead, Mole Valley, West Sussex County, Surrey County, Horley Town Council Charitable Trust	<ul style="list-style-type: none"> <li>Partnership of local authorities and interested groups for environmental improvements in the Gatwick area.</li> <li>Led by Sussex Wildlife Trust.</li> </ul>	15 January 2018 8 March 2018 12 October 2018 2 April 2019 21 October 2019 19 October 2020	
Gatwick Airport	Gatwick Airport Consultative Committee (GATCOM)	Local authorities, parish and town councils, business, tourism, community, environmental, Gatwick Airport Ltd (GAL), Department for Transport.	<ul style="list-style-type: none"> <li>Statutory consultative body for Gatwick Airport (Civil Aviation Act 1982), 28 representatives from wide range of interests.</li> </ul>	27 April 2017 13 July 2017 9 November 2017 25 January 2018 26 April 2018 19 July 2018 18 October 2018 24 January 2019 25 April 2019 18 July 2019	

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				17 October 2019 23 January 2020 16 July 2020 15 October 2020 21 January 2021	
	Gatwick Joint Local Authorities Meeting	Crawley Borough Council, East Sussex County Council, Horsham District Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, Tandridge District Council, West Sussex County Council.	<ul style="list-style-type: none"> <li>Member group.</li> </ul>	30 October 2017 12 June 2018 (electronic update) 26 September 2018 7 August 2019 7 January 2020 12 August 2020	<ul style="list-style-type: none"> <li>→ Gatwick Memorandum of Understanding.</li> <li>→ Monitoring S106 Agreement Actions and Implementation.</li> <li>→ Discussion and liaison on matters relating to Gatwick Airport.</li> <li>→ Greater knowledge across county boundaries.</li> <li>→ Crawley submission Local Plan (2014): paras: 9.12 – 9.15; Policy GAT1.</li> </ul>
	Gatwick Officers Group	Crawley Borough Council, East Sussex County Council, Horsham District Council, Kent County Council, Mid Sussex District Council, Mole Valley District Council, Reigate and Banstead Borough Council, Surrey County Council, Tandridge District Council, West	<ul style="list-style-type: none"> <li>Officer group supporting GJLA, also monitoring S106 actions and implementation and discussing airport development.</li> </ul>	8 June 2016 6 December 2016 24 April 2017 (electronic update) 19 May 2017 (electronic update) 5 September 2017 (Biodiversity Tour) 7 September 2017 (Airport Tour) 29 September 2017 (electronic update) 21 May 2018 11 September 2018	<ul style="list-style-type: none"> <li>→ Gatwick Memorandum of Understanding.</li> <li>→ Monitoring S106 Agreement Actions and Implementation.</li> <li>→ Discussion and liaison on matters relating to Gatwick Airport.</li> <li>→ Greater knowledge across county boundaries.</li> <li>→ Collaboration together and with GAL on the proposed DCO.</li> </ul>

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
		Sussex County Council.		13 November 2018 27 March 2019 5 June 2019 10 July 2019 16 September 2019 26 February 2020 20 April 2020 20 July 2020 29 July 2020 21 January 2021	
		Crawley Borough Council, West Sussex County Council and Gatwick Airport Limited	<ul style="list-style-type: none"> <li>S106 Agreement Meetings</li> </ul>	8 February 2016 12 December 2016 15 June 2017 19 September 2017 24 May 2018 25 September 2018 15 February 2018 9 April 2019 18 April 2019 (with independent Energy consultants) 23 May 2019 26 June 2019 (with independent Energy consultants) 16 September 2019 27 February 2019	→ Monitoring S106 Agreement Actions and Implementation.
	Sussex Environmental Health Officers Groups	East & West Sussex and Surrey District, Boroughs and County Councils and Gatwick Airport Limited	<ul style="list-style-type: none"> <li>Air Quality</li> </ul>	15 November 2016 12 December 2017 13 December 2018 6 December 2019 17 December 2020	Gatwick Airport S106 Agreement Monitoring

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
	Noise and Track Monitoring Advisory Group	Gatwick Airport Limited, Dept. for Transport, CAA, NATS, Airlines, Nominated representatives from GATCOM incl. local authorities.	<ul style="list-style-type: none"> <li>Group monitoring airport-related noise and flight path tracking.</li> </ul>	8 August 2019 7 November 2019 6 February 2020 6 August 2020 5 November 2020 4 February 2021	
	Meetings Independent Commission on Civil Aviation Noise (ICCAN)	Crawley Borough Council and ICCAN	<ul style="list-style-type: none"> <li>Aviation Noise</li> </ul>	14 August 2019 14 October 2019 25 November 2019	Local Advice feeding into National Policy
	Gatwick Airport Transport Forum Steering Group	Gatwick Airport Limited, Metrobus, Highways England, Network Rail, West Sussex County Council, Surrey County Council, TfL, Crawley Borough Council	<ul style="list-style-type: none"> <li>Forum to discuss improvements to surface access and future transport links with and in vicinity of the airport.</li> </ul>	20 April 2017 12 June 2017 20 July 2017 6 October 2017 22 March 2018 28 June 2018 22 March 2018 28 June 2018 20 September 2018 13 December 2018 12 March 2019 11 June 2019 17 September 2019 12 December 2019 4 February 2020 12 March 2020 11 June 2020 3 December 2020	
	Gatwick Parking Survey Officers Group	Crawley, Horsham, Mid Sussex, Mole Valley, Tandridge, Reigate & Banstead, GAL.	<ul style="list-style-type: none"> <li>Discussion and agreement of parking survey results.</li> </ul>	27 January 2016 16 May 2017 23 November 2017 14 September 2018 14 November 2018	Agreement and sign-off of annual Gatwick Airport parking survey. Discussion with GAL. Joint Parking Surveys Undertaken: <ul style="list-style-type: none"> <li>15 September 2017</li> </ul>

Level of Cooperation Mechanism	Group	Membership	Key Issues Covered	Dates of Meetings	Outcomes
				3 December 2019 7 January 2020 30 January 2020 4 December 2020	<ul style="list-style-type: none"> <li>14 September 2018</li> <li>13 September 2019</li> </ul> Shared Local Plan Policy. Success at Appeals.
Crawley Borough Local Plan Consultations	Email notifications of formal consultation	All Gatwick Diamond and West Sussex Authorities and Prescribed Bodies	<ul style="list-style-type: none"> <li>Early Engagement draft Local Plan</li> <li>Submission draft Local Plan (initial Reg. 19 Consultation)</li> <li>Submission draft Local Plan (further Reg. 19 Consultation)</li> </ul>	15 July – 16 September 2019 20 January – 2 March 2020 6 January – 17 February 2021	→ Detailed responses back from neighbouring authorities raising cross-boundary concerns and support on which further detailed discussions could be held to address issues.

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## Appendix D: AMR Summary Extracts and Duty to Cooperate Milestone Timelines 2016 – 2021

### 2016 – 2017

#### Gatwick Diamond Memorandum of Understanding (July 2016)

The Gatwick Diamond Memorandum of Understanding (2012) was updated and agreed by all members of the Gatwick Diamond Authorities<sup>27</sup>.

#### Gatwick Diamond Local Strategic Statement Review (2016)

In April 2016, the Gatwick Diamond Authorities<sup>28</sup> jointly commissioned consultants to undertake a review of the Gatwick Diamond Local Strategic Statement (LSS) (2012). Tandridge District Council, which had previously not formed part of the original Gatwick Diamond LSS published in 2012, participated as a full Authority member and signed up to the LSS update.

This included a Members' workshop, led by the consultants, and held in July 2016, for the Authorities' Portfolio Holders for Planning.

#### County Infrastructure Studies

The West Sussex Infrastructure Study was prepared on behalf of West Sussex and Surrey local authorities. It assesses current infrastructure capacity and deficits in the area and the anticipated requirements to meet population projections. This document covers the whole of West Sussex county area, and is one of two documents published together:

- Surrey Infrastructure Study<sup>29</sup>; and
- West Sussex Infrastructure Study<sup>30</sup>.

In addition, a further document was prepared alongside the two county studies. The Gatwick Diamond Post 2030 Infrastructure Study sought to provide a strategic overview of potential future development between 2030 and 2050, with and without a second runway at Gatwick Airport.

#### West Sussex and Greater Brighton Strategic Planning Board

In March 2017, CBC were formally invited to join the Joint West Sussex and Greater Brighton Strategic Planning Board.

#### Joint Evidence Base Documents

Two new evidence base documents were jointly commissioned by Crawley Borough Council and Horsham District Council: Starter Homes and Housing Market Mix Studies. These were published in December 2016.

#### Attendance at Local Plan examination hearings

Cooperation among the Northern West Sussex Authorities (Crawley, Horsham and Mid Sussex) has included attendance at Local Plan examination hearings by planning policy officers from the other authorities, including the contribution of evidence on relevant issues.

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<sup>27</sup> Gatwick Diamond Authorities: Crawley Borough Council; Horsham District Council; Mid Sussex District Council; Mole Valley District Council; Reigate and Banstead Borough Council; Surrey County Council; Tandridge District Council; West Sussex County Council.

<sup>28</sup> Crawley Borough Council; Horsham District Council; Mid Sussex District Council; Mole Valley District Council; Reigate and Banstead Borough Council; Surrey County Council; Tandridge District Council; West Sussex County Council.

<sup>29</sup> <http://www.surreycc.gov.uk/environment-housing-and-planning/development-in-surrey/surrey-future/surrey-infrastructure-study>

<sup>30</sup>

[http://www.businesswestsussex.co.uk/storage/downloads/resource\\_westsussexinfrastructurestudy\\_1472035643.pdf](http://www.businesswestsussex.co.uk/storage/downloads/resource_westsussexinfrastructurestudy_1472035643.pdf)

This was a feature of the hearings relating to the Mid Sussex District Plan held in November 2016 and January 2017. The focus of these hearing sessions related to Duty to Cooperate and in particular housing numbers and unmet needs arising from Crawley and Brighton and Hove.

A Joint Position Statement, particularly relating to housing needs and supply, has been regularly updated by the three authorities. Further evidence was submitted throughout the Mid Sussex District Plan hearings in particular relation to Crawley's unmet housing needs.

#### Strategic Sites 'At Crawley'

Meetings were held with neighbouring authorities, Horsham District Council; Mid Sussex District Council and Reigate and Banstead Borough Council to discuss proposed, promoted and potential strategic sites close to Crawley's administrative boundary.

A meeting was held with Thames Water, in August 2016, jointly with Horsham and Mid Sussex District Councils, to discuss the capacity of Crawley Sewage Treatment Works and the wastewater network in relation to meeting development needs of planned, proposed and speculative developments within and adjacent to Crawley.

#### Gatwick Officers Group and Gatwick Joint Local Authorities

Crawley Borough Council hosted officers from West Sussex County Council and other adjoining local authorities at meetings of the Gatwick Officers Group (GOG) on 8 June and 6 December 2016, for discussion of current and emerging issues relating to the operation, growth and development of the airport.

An additional meeting was held with Gatwick Airport Limited on 12 December 2016 to discuss the Gatwick Airport Annual Monitoring Report, Legal Agreement, and other issues raised through GOG and the Gatwick Joint Local Authorities meeting.

## 2017 – 2018

#### Gatwick Diamond Local Strategic Statement Review (2017)

In April 2016, the Gatwick Diamond Authorities<sup>31</sup> had jointly commissioned consultants to undertake a review of the Gatwick Diamond Local Strategic Statement (LSS) (2012). Tandridge District Council, which had previously not formed part of the original Gatwick Diamond LSS published in 2012, participated as a full Authority member and signed up to the LSS update.

The updated Gatwick Diamond Local Strategic Statement was agreed at the Members' meeting of the Gatwick Diamond Local Authorities in June 2017 and published subsequently<sup>32</sup>.

#### West Sussex and Greater Brighton Strategic Planning Board

CBC joined the Joint West Sussex and Greater Brighton Strategic Planning Board in an observing capacity in April 2017, and formally joined in January 2018.

As part of the West Sussex and Greater Brighton Strategic Planning Board, CBC participated in the submission of a joint Bid to support strategic planning work for a revised Local Strategic Statement in January 2018.

<sup>31</sup> Crawley Borough Council; Horsham District Council; Mid Sussex District Council; Mole Valley District Council; Reigate and Banstead Borough Council; Surrey County Council; Tandridge District Council; West Sussex County Council.

<sup>32</sup> [Local Strategic Statement](http://www.crawley.gov.uk/pw/Planning_and_Development/Planning_Policy/GatwickDiamondLocalStrategicStatement/index.htm) and [Evidence Base Report](http://www.crawley.gov.uk/pw/Planning_and_Development/Evidence_Base_Report) : further details on CBC webpage: [http://www.crawley.gov.uk/pw/Planning\\_and\\_Development/Planning\\_Policy/GatwickDiamondLocalStrategicStatement/index.htm](http://www.crawley.gov.uk/pw/Planning_and_Development/Planning_Policy/GatwickDiamondLocalStrategicStatement/index.htm)

#### Attendance at Local Plan examination hearings

Cooperation among the Northern West Sussex Authorities (Crawley, Horsham and Mid Sussex) has included attendance at Local Plan examination hearings by planning policy officers from the other authorities, including the contribution of evidence on relevant issues.

This was a feature of the hearings relating to the Mid Sussex District Plan held in July 2017. The focus of these hearing sessions related to Duty to Cooperate and in particular housing numbers and unmet needs arising from Crawley.

The Mid Sussex District Plan was successfully adopted by Mid Sussex District Council in March 2018<sup>33</sup>. This includes the confirmation that the minimum housing figure established within the District Plan includes a contribution towards meeting the unmet needs arising in the Northern West Sussex Housing Market Area from Crawley<sup>34</sup>. In addition, the District Plan commits to account for any residual unmet need through monitoring and future reviews of the District Plan to ensure the HMA can meet its housing need as far as is consistent with the policies set out in the National Planning Policy Framework<sup>35</sup>.

Crawley Borough Council also engaged in the preparation of the Reigate and Banstead Development Management Plan process, submitting responses in relation to the Regulation 18 consultation undertaken November 2017 and Regulation 19 consultation in February 2018.

Discussions were held between Crawley Borough Council and Tandridge District Council in relation to the Tandridge District Local Plan, particularly considering the transport modelling and sites.

#### Strategic Sites 'At Crawley'

Meetings were held with neighbouring authorities, Horsham District Council; Mid Sussex District Council; and Reigate and Banstead Borough Council to discuss proposed, promoted and potential strategic sites close to Crawley's administrative boundary.

#### Ashdown Forest

Meetings were held with a significant number of local authorities<sup>36</sup> affected by the Ashdown Forest Special Area of Conservation and Natural England. These were focused on understanding the requirements of the Habitats Regulations in relation to Local Plan development and planning application approvals. This included the initial preparation of a Statement of Common Ground.

#### Gatwick Officers Group and Gatwick Joint Local Authorities

Crawley Borough Council hosted officers from West Sussex County Council and other adjoining local authorities at meetings of the Gatwick Officers Group (GOG), for discussion of current and emerging issues relating to the operation, growth and development of the airport, and attendance at quarterly GATCOM meetings, which involve the local authorities' Members.

An additional meeting was held with Gatwick Airport Limited on 12 December 2016 to discuss the Gatwick Airport Annual Monitoring Report, Legal Agreement, and other issues raised through GOG and the Gatwick Joint Local Authorities meeting.

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<sup>33</sup> <https://www.midsussex.gov.uk/planning-building/mid-sussex-district-plan/>

<sup>34</sup> Mid Sussex District Plan 2014-2031, pages 30-31 (2018) MSDC

<sup>35</sup> Mid Sussex District Plan 2014-2031, pages 33-34 (2018) MSDC

<sup>36</sup> Including: Brighton and Hove City Council, Crawley Borough Council, East Sussex County Council, Hastings Borough Council, Horsham District Council, Lewes and Eastbourne Councils, Mid Sussex District Council, Rother District Council, Sevenoaks District Council, South Downs National Park Authority, Tandridge District Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council, Wealden District Council and West Sussex County Council.

2018 – 2019

The following outputs were secured during the 2018/19 monitoring year.

Output	Parties	Date
Signed Statement of Common Ground: Ashdown Forest	<ul style="list-style-type: none"> <li>• Crawley Borough Council</li> <li>• Ashdown Forest Authorities</li> </ul>	16 April 2018
Signed Statement of Common Ground: Tandridge Local Plan	<ul style="list-style-type: none"> <li>• Crawley Borough Council</li> <li>• Tandridge District Council</li> </ul>	10 December 2018
Adoption of High Weald AONB Management Plan	<ul style="list-style-type: none"> <li>• Crawley Borough Council</li> <li>• High Weald Authorities</li> </ul>	8 March 2019

Key agreements and actions from the monitoring year are set out below:

Gatwick Diamond

Progress across the Gatwick Diamond Authorities during the 2018/19 monitoring period primarily focused on supporting joint representations to the London Plan Examination. This included representatives from the Gatwick Diamond Local Planning Authorities' attendance at the housing numbers technical seminar (November 2018) and as part of the wider south east hearing session (January 2019).

West Sussex and Greater Brighton Strategic Planning Board

Crawley Borough Council attended the Strategic Planning Board meetings held in July 2018 and February 2019, and participated in the Officer Group, through meetings and electronic correspondence, established to progress the strategic cross-boundary joint working for the area and to support the Planning Board.

Northern West Sussex Authorities

Regular meetings were held between the Northern West Sussex Authorities (Crawley, Horsham, Mid Sussex and West Sussex County). These meetings include constructive discussions regarding implementation of the existing adopted Local Plan, progression towards reviews of the Local Plans and updating of the joint evidence base.

During the 2018/19 monitoring year this included the joint commissioning of the following evidence:

- EcoServ – Horsham and Crawley, commissioned September 2018;
- Economic Growth Assessment – Crawley, Horsham and Mid Sussex, commissioned February 2019;
- Strategic Housing Market Assessment – Crawley and Horsham, with Mid Sussex engaged, commissioned February 2019.

Attendance at Local Plan examination hearings and the preparation of Local Plans

Cooperation among the Gatwick Diamond Authorities (Crawley, Horsham, Mole Valley, Mid Sussex, Reigate and Banstead, Surrey County, Tandridge and West Sussex County) on Local Plan preparations has included providing feedback on emerging Local Plans and approaches, discussions on cross-boundary matters and preparation of Statements of Common Ground as well as attendance at Local Plan examination hearings by planning policy officers.

Crawley Borough Council made representations to the initial Regulation 18 public consultation undertaken by Horsham District Council on its Horsham District Plan review in June 2018.

Crawley Borough Council also engaged in the preparation of the Reigate and Banstead Development Management Plan process, following up the representations made in the previous monitoring period, with Crawley Borough Council officer attendance at the Examination hearing sessions held on Duty to Cooperate and Economic Growth (October 2018) and in relation to the Strategic Employment Site (November 2018).

Discussions were held between Crawley Borough Council and Tandridge District Council in relation to the Tandridge District Local Plan, particularly considering the transport modelling and sites in June 2018. This concluded in a jointly signed Statement of Common Ground between the two authorities (December 2018)

#### Strategic Sites 'At Crawley'

Meetings were held with neighbouring authorities, Horsham District Council; Mid Sussex District Council; and Reigate and Banstead Borough Council to discuss proposed, promoted and potential strategic sites close to Crawley's administrative boundary.

In particular, regular meetings were attended by officers in relation to proposals being promoted by Homes England in relation to strategic development to the west of Crawley, for up to 10,000 new homes, in the form of three new neighbourhoods as urban extensions to Crawley, within Horsham District Council's administrative area. These meetings involved both Horsham District and Crawley Borough Councils as well as West Sussex County Council.

#### Ashdown Forest

Meetings were held with a significant number of local authorities<sup>37</sup> affected by the Ashdown Forest Special Area of Conservation and Natural England. These were focused on understanding the requirements of the Habitats Regulations in relation to Local Plan development and planning application approvals. In order to understand the issues at the highest officer level in the council, meetings across the Local Authorities' Chief Executives were held in addition to those at the technical officer level.

The joint working across the authorities secured the preparation, and signing, of a Statement of Common Ground (April 2018).

A meeting was also held across the wider authorities in specific relation to the Wealden draft Local Plan in September 2018.

#### Gatwick Officers Group and Gatwick Joint Local Authorities

Crawley Borough Council hosted officers from West Sussex County Council and other adjoining local authorities at meetings of the Gatwick Officers Group (GOG), for discussion of current and emerging issues relating to the operation, growth and development of the airport, and attendance at quarterly GATCOM meetings, which involve the local authorities' Members. A Noise and Mitigation Briefing Session was held in April 2018.

An additional meeting was held with Gatwick Airport Limited on 5 April 2018 to discuss the Gatwick Airport Annual Monitoring Report.

#### Infrastructure

Meetings were held between Crawley Borough Council and the infrastructure providers in relation to the following:

- Education (LocatED, April 2018)

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<sup>37</sup> Including: Brighton and Hove City Council, Crawley Borough Council, East Sussex County Council, Hastings Borough Council, Horsham District Council, Lewes and Eastbourne Councils, Mid Sussex District Council, Rother District Council, Sevenoaks District Council, South Downs National Park Authority, Tandridge District Council, Tonbridge and Malling Borough Council, Tunbridge Wells Borough Council, Wealden District Council and West Sussex County Council.

- Rail – potential new stations between Crawley and Horsham (Horsham District Council, Crawley Borough Council, West Sussex County Council, Network Rail and the Developers, ‘at least’ monthly meetings between April and August 2018)
- Waste Water Network and Waste Water Treatment (Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Thames Water, November 2018).

### 2019 – 2020

The following outputs were secured during the 2019/20 monitoring year.

Output	Parties	Date
Publication of Joint Evidence: Strategic Housing Market Assessment	<ul style="list-style-type: none"> <li>• Crawley Borough Council</li> <li>• Horsham District Council</li> </ul>	29 November 2019
Joint Signed Homes England Strategic Site Planning Performance Agreement	<ul style="list-style-type: none"> <li>• Crawley Borough Council</li> <li>• Horsham District Council</li> <li>• West Sussex District Council</li> <li>• Homes England</li> </ul>	8 January 2020
Formal Letter sent to all Neighbouring Authorities to clarify Crawley Borough’s level of unmet needs.	<ul style="list-style-type: none"> <li>• Crawley Borough Council</li> <li>• Local Authorities within the Coast to Capital LEP area</li> </ul>	21 January 2020
Publication of Joint Evidence: Economic Growth Assessment	<ul style="list-style-type: none"> <li>• Crawley Borough Council</li> <li>• Horsham District Council</li> <li>• Mid Sussex District Council</li> </ul>	27 January 2020

Key agreements and actions from the monitoring year are set out below:

#### Gatwick Diamond Local Planning Authorities

The Gatwick Diamond Authorities continued to meet to discuss cross-boundary and strategic planning issues affecting the area.

#### West Sussex and Greater Brighton Strategic Planning Board

As part of the West Sussex and Greater Brighton Strategic Planning Board, CBC has been in discussions regarding taking forward work on a Local Strategic Statement (LSS3) for the West Sussex and Greater Brighton area.

Two member meetings of the Strategic Planning Board were held during this monitoring year (12 September 2019 and 25 March 2020) in order to progress the necessary background evidence work to support this.

#### Northern West Sussex Authorities

Meetings were held between the Northern West Sussex Authorities (CBC, Horsham District, Mid Sussex District and West Sussex County Councils) to consider the implications of the Local Plan Reviews and updated evidence across the housing market area.

Two significant pieces of background evidence were jointly commissioned and completed covering the Northern West Sussex area: the Strategic Housing Market Assessment (an update commissioned by Crawley Borough Council and Horsham District Council, with Mid Sussex District Council as a partner, reflecting the different stages of plan preparation of the three authorities) and the Economic Growth Assessment (jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council).

Work commenced on an updated Statement of Common Ground for the Northern West Sussex authorities to support the Local Plan Reviews.

### Engagement in Local Plan preparations

Cooperation has included discussions and engagement in neighbouring authorities' Local Plan preparations. This has included engagement in the Mid Sussex District Plan Site Allocations Development Plan Document. This ensured CBC were kept sufficiently informed in the emerging evidence to allow for progression to be made towards preparing a Statement of Common Ground between the two authorities to support this process.

### Strategic Sites 'At Crawley'

Meetings were held with Horsham District Council and West Sussex County Council to discuss proposed, promoted and potential strategic sites close to Crawley's administrative boundary. This includes the long-term strategic proposals for up to three new neighbourhoods to the west of Crawley, being promoted by Homes England, and the detailed "first phase" neighbourhood of this wider Homes England aspiration, to the west of Ifield.

A joint agreement was signed by the authorities, Crawley Borough Council, Horsham District Council and West Sussex County Council, and Homes England to formally discuss pre-application matters, without prejudice, in relation to the Homes England promoted West of Ifield site, immediately adjacent to Crawley's administrative borough boundaries. Whilst this site lies predominantly within Horsham District, some landownership is within Crawley's boundaries and infrastructure linkages would connect into the borough, and the impacts on services and setting would be felt mostly on the town of Crawley.

Following this agreement, a series of technical pre-application meetings have been held jointly with officers from each authorities in attendance. Technical meetings have involved on-going discussions on: transport, including transport modelling, the need for a Crawley western link road and maximising sustainable transport options; education; open space provision; sustainability and exemplar development; and existing character assessment. Crawley's urban design expertise is a shared resource for both Crawley and Horsham authorities in relation to these proposals.

### Gatwick Officers Group and Gatwick Joint Local Authorities

Crawley Borough Council arranged officers from West Sussex County Council and other adjoining local authorities at meetings of the Gatwick Officers Group (GOG), for discussion of current and emerging issues relating to the operation, growth and development of the airport including the proposed Development Consent Order for the use of the Northern Runway, and attendance at quarterly GATCOM meetings, which involve the local authorities' Members.

### Infrastructure

Meetings were continued to be held between Crawley Borough Council and a wide range of interested organisations in relation to the potential new stations between Crawley and Horsham (Horsham District Council, Crawley Borough Council, West Sussex County Council, Network Rail, Department for Transport, GTR, Coast to Capital LEP) to consider further the impacts and potential options and opportunities.

Meetings were held to prepare and commence the Transport Modelling for the Crawley Local Plan between Crawley Borough Council and West Sussex County Council. This included liaising with Highways England on the draft brief, as part of the Inception Meeting with the appointed consultants, and in agreeing the detailed methodology.

The Gatwick Sub-Region Water Cycle Study update was jointly commissioned by Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead Borough Council. This study included the involvement of the water companies, the Environment Agency and Natural England.

A joint Strategic Flood Risk Assessment was commissioned by Crawley Borough Council and Horsham District Council. This included the involvement of the Environment Agency.

2020 – 2021

The following outputs were secured during the 2020/21 monitoring year.

Output	Parties	Date
Signed West Sussex County Statement of Common Ground	<ul style="list-style-type: none"> <li>West Sussex County Council</li> <li>All West Sussex District and Borough Councils</li> <li>South Downs National Park Authority</li> </ul>	27 April 2020
Signed Mid Sussex and Crawley Statement of Common Ground: Mid Sussex Site Allocations Development Plan Document	<ul style="list-style-type: none"> <li>Mid Sussex District Council</li> <li>Crawley Borough Council</li> </ul>	6 May 2020
Signed Northern West Sussex Statement of Common Ground	<ul style="list-style-type: none"> <li>Crawley Borough Council</li> <li>Horsham District Council</li> <li>Mid Sussex District Council</li> <li>West Sussex County Council</li> </ul>	6 June 2020
Completion of Joint Evidence: Gatwick Sub-Region Water Cycle Study	<ul style="list-style-type: none"> <li>Crawley Borough Council</li> <li>Horsham District Council</li> <li>Mid Sussex District Council</li> <li>Reigate and Banstead Borough Council</li> </ul>	28 August 2020
Completion of Joint Evidence: Strategic Flood Risk Assessment	<ul style="list-style-type: none"> <li>Crawley Borough Council</li> <li>Horsham District Council</li> </ul>	14 September 2020
Signed Crawley Borough Council and Mole Valley District Council Statement of Common Ground	<ul style="list-style-type: none"> <li>Crawley Borough Council</li> <li>Mole Valley District Council</li> </ul>	25 January 2021
Signed Crawley Borough Council and Reigate and Banstead Borough Council Statement of Common Ground	<ul style="list-style-type: none"> <li>Crawley Borough Council</li> <li>Reigate and Banstead Borough Council</li> </ul>	5 February 2021

Key agreements and actions from the monitoring year are set out below:

Gatwick Diamond Local Planning Authorities

CBC met with a number of the Gatwick Diamond Authorities individually during this monitoring year, in order to progress specific cross-boundary strategic issues.

This included:

- Mole Valley District Council, in relation to housing needs and delivery, employment needs, education, health and green belt.
- Reigate and Banstead Borough Council, in relation to employment needs and strategic employment sites, transport and highway network implications, water and waste water infrastructure capacity, housing needs and delivery, Gatwick Airport, education and health.

West Sussex and Greater Brighton Strategic Planning Board

The West Sussex and Greater Brighton Strategic Planning Board appointed a Strategic Planning Advisor, who commenced work with the Planning Officers for West Sussex and Greater Brighton in summer 2020.

Meetings of the Strategic Planning Board agreed joint responses to the Government's consultations on Planning Reform: Changes to the Current Planning System and the Planning White Paper (October and November 2020). As well as considering and agreeing the revised work programme of the LSS3, taking into account delays caused by COVID and the appointment of the Strategic Planning Advisor.

#### Northern West Sussex Authorities

A Statement of Common Ground was signed by the Northern West Sussex Authorities (CBC, Horsham District, Mid Sussex District and West Sussex County Councils).

#### Engagement in Local Plan preparations

Cooperation has included discussions and engagement in neighbouring authorities' Local Plan preparations, on an individual one-to-one basis, to discuss the details of the progression on Local Plans, including the unmet needs arising from Crawley as identified through the emerging Crawley Borough Local Plan Review.

This has led to signed Statements of Common Ground with Mole Valley District Council and Reigate and Banstead Borough Council.

Frequent planning policy meetings with Horsham District Council have been held, particularly important as the two Local Plan Reviews are being prepared against a similar timetable. A Statement of Common Ground is in preparation between the two authorities.

A Statement of Common Ground between Mid Sussex and CBC to the Mid Sussex District Plan Site Allocations Development Plan Document was signed.

#### Strategic Sites 'At Crawley'

Meetings were held with neighbouring authorities, Horsham District Council and West Sussex County Council to discuss proposed and potential strategic sites promoted by Homes England close to Crawley's administrative boundary continuing on as part of the planning performance agreement in relation to the first phase new neighbourhood at west of Ifield, as well as strategic meetings relating to the wider scheme and key infrastructure elements associated with that.

Whilst this site lies predominantly within Horsham District, some landownership is within Crawley's boundaries and infrastructure linkages would connect into the borough, and the impacts on services and setting would be felt mostly on the town of Crawley.

Technical pre-application meetings have been held jointly with officers from each authorities in attendance. Technical meetings have involved on-going discussions on: transport, including transport modelling, the need for a Crawley western link road and maximising sustainable transport options; education; open space provision; sustainability and exemplar development; and existing character assessment. Crawley's urban design expertise is a shared resource for both Crawley and Horsham authorities in relation to these proposals.

Joint discussions between Horsham District Council and Crawley Borough Council agreed the starting point of a 'blended' housing mix based on the evidence set out in the joint Strategic Housing Market Assessment.

Facilities Planning Model work commenced with Sport England leading this, to understand the needs of indoor sports facilities (sports halls and swimming pools) from strategic urban extensions to Crawley.

#### Ashdown Forest

Continued engagement by CBC in the Ashdown Forest Working Group to understand the requirements of the Ashdown Forest SAC/SPA on the Habitats Regulations requirements for CBC as part of the Local Plan Review process, in particular in relation to cumulative impacts. This included joint commissioning and consideration of options for continuing monitoring across the Ashdown Forest and what form this could and should take.

#### Gatwick Officers Group and Gatwick Joint Local Authorities

Due to the major impact of the COVID-19 pandemic on aviation, Gatwick Airport Limited (GAL) paused their work on the Development Consent Order. An electronic update was circulated to the Gatwick Officers Group (GOG) and Gatwick Joint Local Authorities (GJLA) members. West Sussex County Council and Crawley Borough Council met with GAL to discuss the updating of the S106 Agreement, and both councils have inputted into the independent verification of GAL's Annual Monitoring Report. Crawley Borough Council arranged a GOG meeting for January 2021 to discuss current and emerging issues relating to the operation, growth and development of the airport. Crawley Borough Council attended the GATCOM meetings in July and October, and presented its Local Plan policies at the January 2021 GATCOM meeting.

#### Infrastructure

A Statement of Common Ground was signed between West Sussex County Council and all of the district and borough authorities within the county, setting out an agreed framework for working on county matters.

Meetings were continued to be held between Crawley Borough Council and a wide range of interested organisations in relation to the potential new stations between Crawley and Horsham (Horsham District Council, Crawley Borough Council, West Sussex County Council, Network Rail, Department for Transport, GTR, Coast to Capital LEP) to consider further the impacts and potential options and opportunities. The final report on this, prepared by WSP on behalf of Network Rail, was shared to all partners.

Meetings were held to inform the Transport Modelling for the Crawley Local Plan between Crawley Borough Council and West Sussex County Council and the appointed consultants. A draft report was shared and comments were provided back to the consultants.

Strategic transport discussions have taken place to consider the further work needed to assess the potential route of the Crawley western link road through the Gatwick Airport Safeguarded land, including the impact on the potential River Mole diversion and existing land uses.

The Gatwick Sub-Region Water Cycle Study update was completed. This had been jointly commissioned by Crawley Borough Council, Horsham District Council, Mid Sussex District Council and Reigate and Banstead Borough Council. This study included the involvement of the water companies, the Environment Agency and Natural England.

A joint Strategic Flood Risk Assessment was completed. This had been jointly commissioned by Crawley Borough Council and Horsham District Council. This included the involvement of the Environment Agency.

Further work was commissioned jointly by Crawley Borough Council, Horsham District Council and Chichester District Council, along with input from South Downs National Park, Arun District Council, Mid Sussex District Council and Waverley Borough Council on securing water neutrality over the Southern Water Sussex North Water Resource Area.

**Appendix E: Northern West Sussex Housing Market Area Combined Housing Trajectories 2015 – 2030**

Adopted Plan Housing Trajectories																	
CBLP Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
Annual Year	15/ 16	16/ 17	17/ 18	18/ 19	19/ 20	20/ 21	21/ 22	22/ 23	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30		
Crawley	389	724	870	455	389	379	301	310	338	337	248	208	55	55	55	<b>5113</b>	
Horsham	1,201	1,139	1,277	994	821	798	892	869	815	953	621	600	580	480	400	<b>12440</b>	
Mid Sussex	876	876	876	876	876	876	876	876	876	1,090	1,090	1,090	1,090	1,090	1,090	<b>14424</b>	
<b>NWS HMA Total</b>	<b>2,466</b>	<b>2,739</b>	<b>3,023</b>	<b>2,325</b>	<b>2,086</b>	<b>2,053</b>	<b>2,069</b>	<b>2,055</b>	<b>2,029</b>	<b>2,380</b>	<b>1,959</b>	<b>1,898</b>	<b>1,725</b>	<b>1,625</b>	<b>1,545</b>	<b>31,977</b>	
<i>Cumulative HMA Total</i>	<i>2,466</i>	<i>5,205</i>	<i>8,228</i>	<i>10,553</i>	<i>12,639</i>	<i>14,692</i>	<i>16,761</i>	<i>18,816</i>	<i>20,845</i>	<i>23,225</i>	<i>25,184</i>	<i>27,082</i>	<i>28,807</i>	<i>30,432</i>	<i>31,977</i>		
	<b>Actual Net Housing Delivery</b>				<b>Current Housing Trajectories</b>												
CBLP Plan Year	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15		
Annual Year	15/ 16	16/ 17	17/ 18	18/ 19	19/20	20/ 21	21/ 22	22/ 23	23/ 24	24/ 25	25/ 26	26/ 27	27/ 28	28/ 29	29/ 30		
Crawley	541	596	369	512	404	740	220	437	453	295	582	952	696	509	400	7,706	
Horsham	1,201	795	1,125	1,368	955	710	605	1,034	1,311	1,444	792	753	465	445	389	13,392	
Mid Sussex	868	912	843	661	1,027	1,027	1,200	1,628	1,628	1,023	1,023	1,023	1,023	1,023	654	15,563	
<b>NWS HMA Total</b>	<b>2,610</b>	<b>2,303</b>	<b>2,337</b>	<b>2,541</b>	<b>2,386</b>	<b>2,477</b>	<b>2,025</b>	<b>3,099</b>	<b>3,392</b>	<b>2,762</b>	<b>2,397</b>	<b>2,728</b>	<b>2,184</b>	<b>1,977</b>	<b>1,443</b>	<b>36,661</b>	
<i>Cumulative HMA Total</i>		<i>4,913</i>	<i>7,250</i>	<i>9,791</i>	<i>12,177</i>	<i>14,654</i>	<i>16,679</i>	<i>19,778</i>	<i>23,170</i>	<i>25,932</i>	<i>28,329</i>	<i>31,057</i>	<i>33,241</i>	<i>35,218</i>	<i>36,661</i>		

## Appendix F: Summary of Joint Evidence Base Documents

Document	Joint Authorities	Study Scope
West of Bewbush Joint Area Action Plan (July 2009) Crawley Borough Council and Horsham District Council	Crawley, Horsham	Adopted Area Action Plan Development Plan Document for strategic neighbourhood development adjacent to Crawley within Horsham District.
Northern West Sussex Strategic Housing Market Area (November 2019) Icenii	Crawley and Horsham	Housing Market & Housing Needs
Economic Growth Assessment (January 2020) Lichfields	Crawley, Mid Sussex, Horsham	Employment Land requirement
Eco-Serv GIS Report (2019)	Crawley and Horsham	Green Infrastructure Ecological Services
Gatwick Sub-Region Water Cycle Study (August 2020)	Crawley, Mid Sussex, Horsham, Reigate and Banstead	Water Resource Update.
Strategic Flood Risk Assessment (September 2020)	Crawley and Horsham	SFRA for the Crawley and Upper Mole Catchment.
Local Plan Transport Study (Draft Report)	Crawley Borough Council, West Sussex County Council	Work ongoing
Sussex North Water Neutrality Assessment (Draft Report)	Crawley, Horsham and Chichester Councils	Work ongoing

## Appendix G: Responses from Neighbouring Authorities, Prescribed Bodies and Statutory Consultees to Local Plan Consultations

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## i. Early Engagement Consultation (15 July – 16 September 2019)

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP157/531	Department for Education		<p>Consultation under Regulation 18 of Town and Country Planning (Local Planning) (England) Regulations 2012 Submission of the Department for Education</p> <p>1. The Department for Education (DfE) welcomes the opportunity to contribute to the development of planning policy at the local level.</p> <p>2. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and DfE is the delivery body for many of these, rather than local education authorities. However, local education authorities still retain the statutory responsibility to ensure sufficient school places, including those at sixth form, and have a key role in securing contributions from development to new education infrastructure. In this context, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We have published guidance on education provision in garden communities and securing developer contributions for education, at <a href="https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth">https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth</a>. You will also be aware of the corresponding additions to Planning Practice Guidance on planning obligations, viability and safe and healthy communities.</p> <p>3. We would like to offer the following comments in response to the above consultation document.</p> <p>General Comments</p> <p>4. DfE notes that the draft Local Plan anticipates an annual housing target of 451 dwellings per year until 2024/25 and then 255 dwellings per year until the end of the plan period in 2035. This will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.</p> <p>5. Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under</p>	<p>Policy IN1 has been amended to refer specifically to seeking planning obligations towards specific Education schemes related to development. The Planning Obligations Annex sets out approaches for pursuing these contributions. The Borough Council welcomes the support of the DfE and WSCC in identifying and costing appropriate schemes to secure this funding to help meet the demand for new school places.</p> <p>Policy H1 Housing Delivery Trajectory has been amended, with 500 dpa now anticipated 2020-25; 440 dpa 2025-30; and 117 dpa 2030-35.</p> <p>The Adopted Local Plan Infrastructure Plan established that additional secondary school capacity was required, and that it could be met through the expansion of existing secondary schools within the borough. However, since then a school promoter secured funding for a new school in Crawley and instead of extensions, therefore, site options for a new secondary school in Crawley have been exhaustively considered by CBC, WSCC, LocatED and the DfE over the past two years. Given the constrained land supply in the borough, no site has been found to be appropriate to all parties. The Local Plan does not, therefore, propose specific allocations for educational uses, but Policy IN2 has been amended to state that schools may be an acceptable alternative use on sites allocated for uses including housing, subject to relevant requirements being met.</p>

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools<sup>1</sup> as well as specifically in relation to opening free schools in garden communities.</p> <p>6. The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).</p> <p>7. In order to comply with this national policy, the Local Plan should safeguard land for the provision of new schools and school expansions where appropriate. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education.</p> <p>8. Crawley Borough Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development<sup>4</sup> (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>9. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27), DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan.</p>	<p>Education is one of the strategic matters identified in the Statement of Common Ground being prepared through the Duty to Cooperate, and Policy H3g states criteria necessary for development of urban extensions adjacent to Crawley to be supported, including if the development helps meet unmet needs of Crawley, including for Education.</p>

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			10. Where there is significant cross-boundary movement of school pupils between a borough and adjoining areas, DfE recommends that the Council covers this matter and progress in cooperating to address it as part of its Statement of Common Ground. This should be regularly updated during the plan-making process to reflect emerging agreements between participating authorities and the Council's own plan-making progress.	
REP157/532	Department for Education	Para. 1.20 – 1.21	<p>11. DfE welcomes reference within the plan's vision to the role of education provision in creating stronger communities. Paragraph 1.20 refers to collaboration between Crawley Borough Council and other authorities and infrastructure providers to meet forecast demands. You will be aware of two live free school projects in Crawley, being delivered directly by DfE through the 'wave' approval route explained above in paragraph 5, rather than West Sussex County Council. These projects include:</p> <ul style="list-style-type: none"> <li>• Gatwick Free School – which is open on a site at 23 Gatwick Road and in the process of securing permanent planning permission; and</li> <li>• Forge Wood High School – which does not yet have an identified site.</li> </ul> <p>12. Due to these projects, it would be helpful to include DfE in your discussions about infrastructure provision, involving us in the position statements the plan refers to in paragraph 1.21. There should be collaborative working between DfE, Crawley Borough Council and West Sussex County Council on education provision to meet the needs of the borough.</p>	The DfE's continued engagement with WSCC and CBC is welcomed.
REP157/533	Department for Education	Para. 2.21	13. Paragraph 2.21 of the draft Local Plan recognises the unusual population profile in Crawley, with around two thirds of the population under the age of 45 and forecast demographic change leading to increased demand for educational facilities. However, there are no proposals in the plan to allocate sites for education, and the draft Infrastructure Delivery Plan (IDP) provides very little detail on school provision to meet demand from anticipated housing growth. The lack of detail on school provision in the current Local Plan is one of the reasons why it has been difficult to successfully progress schemes for new education provision in the Crawley area.	The Adopted Local Plan Infrastructure Plan established that additional secondary school capacity was required, and that it could be met through the expansion of existing secondary schools within the borough. However, since then a school promoter secured funding for a new school in Crawley and instead of extensions, therefore, site options for a new secondary school in Crawley have been exhaustively considered by CBC, WSCC, LocatED and the DfE over the past two years.

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			<p>14. For the plan to be effective and positively prepared, the IDP should identify which developments the planned school provision will serve (including cumulative or windfall developments where appropriate), the costs of provision, the predicted timescales in line with the housing trajectory, and the funding sources for each identified education project. The IDP should be prepared in conjunction with an updated viability assessment to ensure that realistic education costs are factored into any decisions about the amount and type of developer contributions that will be required.</p> <p>15. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities.</p> <p>16. Site allocations (for standalone school sites or schools within housing developments) should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicate this might be necessary.</p> <p>17. While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none"> <li>- specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for</li> </ul>	<p>Given the constrained land supply in the borough, no site has been found to be appropriate to all parties. The Local Plan does not, therefore, propose specific allocations for educational uses, but Policy IN2 has been amended to state that schools may be an acceptable alternative use on sites allocated for uses including housing, subject to relevant requirements being met.</p> <p>Policy IN1 has been amended to refer specifically to seeking planning obligations towards specific Education schemes related to development. The Planning Obligations Annex sets out approaches for pursuing these contributions. The Borough Council welcomes the support of the DfE and WSCC in identifying and costing appropriate schemes to secure this funding to help meet the demand for new school places.</p> <p>The Viability Assessment for the Local Plan, which will include assessment of all the Plan policies, and the Community infrastructure Levy, will take account of required contributions for education.</p>

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			<p>any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that</p> <ul style="list-style-type: none"> <li>- requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.</li> </ul>	
REP157/534	Department for Education	Page 83	<p>18. With regard to the consultation questions on key infrastructure priorities and whether any community facilities are missing or need improvement (page 83), DfE recommends that the next version of the Local Plan make reference to the provision of new schools on suitable sites when required, with a key priority that the provision of infrastructure should be in step with housing development, making appropriate use of developer contributions.</p>	See comments below regarding proposed amendment to Policy IN1.
REP157/535	Department for Education	Policy IN1	<p>19. With regard to the consultation questions for draft Policy IN1 (Infrastructure Provision), asking whether the proposed approach is appropriate, justified and consistent with the Community Infrastructure Levy (CIL) Regulations, DfE advises that the approach is reviewed following the introduction of the revised CIL Regulations on 1<sup>st</sup> September 2019. The CIL Charging Schedule should be reviewed alongside the Local Plan review, giving consideration to new Planning Practice Guidance on viability, CIL and planning obligations as well as the new CIL Regulations which remove the pooling limitation on planning obligations and allow both CIL and Section 106 funding to be used for the same item of infrastructure. These considerations are fundamental to your assessment of the deliverability of the plan, including the size of any infrastructure funding gap and how developer contributions should be secured. All phases and types of education should be considered, including the need for special educational needs provision, with needs and plans for provision set out in the plan.</p> <p>20. We note the statement in the IDP that provision of schools will form part of the calculation of CIL and additional funding sources will need to be considered. In light of the removal of the Section 106 pooling restriction and increased flexibility in how CIL and Section 106 funds are used, we recommend that the Council revisit this matter and consider using Section 106</p>	Policy IN1 has been amended to refer specifically to seeking planning obligations towards specific Education schemes related to development. The Planning Obligations Annex sets out approaches for pursuing these contributions.

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			<p>planning obligations for the provision of new schools and school expansions in all cases where the development will give rise to a need for new school places and there is insufficient capacity in applicable schools to meet that need. It is important to consider the size of any CIL funding gap and whether there will be sufficient CIL funds available to cover the cost of these school places. If CIL will be insufficient or unavailable at the point of need, it would be preferable to seek developer contributions through a planning obligation, to mitigate the direct impacts of development.</p> <p>21. As recommended above, construction costs and land requirements should be incorporated in the viability assessment to ensure that any barriers to delivery are identified early, to inform the Council's planning and prioritisation of infrastructure delivery. Government 'basic need' grant for the creation of new school places does not include funding for land acquisition. Therefore, it is particularly important that education land required within large development sites is provided at no cost to the local authority wherever possible, and pooled developer contributions (Section 106 and/or CIL) are secured for the purchase of standalone sites for new schools. We request that you consider carefully the appropriate balance of CIL and Section 106 funding for education, to ensure that new schools and school expansions can be delivered when they are needed, in step with housing development. Our guidance on securing developer contributions for education provides further advice on the types of education need that should be considered, and how to calculate the costs of provision.</p>	
REP157/536	Department for Education	Policy IN2	<p>22. DfE supports the sustainability objectives of draft Policy IN2 (New Infrastructure Provision). As explained above, DfE recommends that sites for schools are allocated in the plan, but in the absence of specific allocations the plan should at least recognise that essential community infrastructure such as schools may be considered an acceptable alternative use to other allocated uses, provided the location is proven to be environmentally sustainable and suitable to meet the needs of the community served. This is important in view of the land availability constraints in the borough and the importance of providing infrastructure for existing and new communities. It would also align with the "great weight" placed on the provision of school places in the NPPF. Making</p>	<p>Site options for a new secondary school in Crawley have been exhaustively considered by CBC, WSCC, LocatED and the DfE over the past two years and no site has been found to be appropriate to all parties. The Local Plan does not, therefore, propose specific allocations for educational uses, but Policy IN2 has been amended to give effect to this suggestion: i.e. stating that schools may be an acceptable alternative use on sites allocated</p>

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			<p>this clear in the plan would simplify the decision-making process when planning applications are considered. DfE requests this clarification in answer to the consultation question on page 85, asking whether the wording needs further clarification in the policy or elsewhere.</p> <p>23. While there appears to be an intention to roll forward existing allocations from the adopted Local Plan, the Council should consider afresh the need for education facilities and the mechanisms for delivery, taking account of the latest Planning Practice Guidance and DfE guidance on securing developer contributions for education. As noted above, the absence of detail on education provision in the current Local Plan has been an issue for school delivery in the Crawley area.</p>	for uses including housing, subject to relevant requirements being met.
REP157/537	Department for Education		<p>24. Whether in addition to or in replacement of the IDP, the Council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders.</p> <p>25. DfE would be particularly interested in responding to any update to the IDP/Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.</p>	<p>The Infrastructure Plan has been updated to reflect further findings and feedback from the Regulation 18 consultation.</p> <p>The IFS and its contents are described in the updated CIL Regulations and it is understood it will take the form of a data standard to be set out by MHCLG. Noted.</p>
REP196/806	Environment Agency		<p>Thank you for consulting us on the above. We have the following comments to make.</p> <p><b>FLOOD RISK</b> <b>Draft Local Plan</b></p> <p>The commentary in the draft Local Plan highlights that due to the constraints that are present within the Borough and the housing requirement to meet predicted demand, there is likely to be a need for Crawley to work strategically with adjacent Local Authorities to assist in reducing the unmet housing gap. It is essential that Crawley works closely with adjacent Local Authorities in order to strategically manage flood risk. Watercourses cross over Authority boundaries, flood risk</p>	<p>The council agrees flooding and drainage are cross boundary issues to be addressed as part of the duty to cooperate.</p> <p>The council is working with Horsham District Council to update the Strategic Flood Risk Assessment for the upper River Mole catchment. This work is being undertaken in consultation with the Environment Agency.</p> <p>Policy H3g (urban extensions) (sub para. iii) identifies flooding and drainage as one criteria which the council will use in engaging with</p>

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			<p>should be considered on a catchment basis as development in one area can have impacts elsewhere. Planning Policy requires development to demonstrate and ensure that flood risk can be managed on site for the lifetime of the development, without increasing the risk to flooding elsewhere.</p> <p>The Strategic Flood Risk Assessment (SFRA) for the Crawley Borough area is referenced within the Supporting Guidance Documents. The Council may wish to consider whether the SFRA is up to date, and reflects the most recent flood risk information. The Environment Agency has recently undertaken a project to update the flood risk mapping for the Upper Mole area, which Crawley Borough is located within. The latest and most up to date flood risk mapping should be utilised as part of the development of the draft Local Plan. We also new guidance on Strategic Flood Risk Assessments.</p>	adjacent authorities, developers and other stakeholders.
REP196/813	Environment Agency	Local Plan Map	<p><b>Draft Local Plan Map</b> No comments.</p>	
REP196/815	Environment Agency	Consultation Statement	<p><b>Draft Consultation Statement</b> Below para 1.6 - Only Southern Water is identified as a key stakeholder. Thames Water provides the sewerage provision (see Draft Infrastructure Plan p7). SES Water and South East Water supply water to small parts of the area (as described in the Draft Infrastructure Plan).</p>	Noted. Crawley Borough Council has jointly commissioned an updated Water Cycle Study, working with Horsham District Council, Mid Sussex District Council and Reigate & Banstead Borough Council. This work is being supported and informed by a wider stakeholder group that includes the Environment Agency, Natural England, Southern Water, Thames Water, South East Water and Sutton & East Surrey Water.
REP196/819	Environment Agency	Consultation Statement	<p><b>Consultation Statement, July 2019</b> Page 3 - The table does not mention Thames Water as having been consulted. This is one partner that would have direct impacts on maintaining and / or improving water quality so they should have been consulted.</p>	Noted. To confirm, Thames Water has been consulted on the Local Plan and has provided feedback at the Regulation 18 stage and in relation to the draft Infrastructure Plan.
REP196/817	Environment Agency	Policies SD1	<p><b>INTEGRATED ENVIRONMENTAL PLANNING</b> <b>Draft Local Plan</b> Page 13, 1.26 - The strategic issues relating to the future development of Crawley do not include water resources. Considering that the South East is an area that is susceptible to water stress, which has been</p>	Agree: new bullet included in para. 1.26 relating to water resources. Comments in relation to water stress references in paras. 2.33-2.35 noted.

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			<p>acknowledged in the Local Plan (refer to comment 2 below), consideration should be given to including water resources as a strategic issue.</p> <p>Page 24, 2.33 -2.35 – This section deals with Environmental Sustainability, which highlights that the borough has been identified as an area of serious water stress. Page 178, 14.5 reinforces the point of water stress. The consequences of water stress are dealt with to some extent in the Local Plan, but dealing with water stress has not been consistent in all sections of the Local Plan.</p> <p>Page 24, 2.33 - 2.25 – This section deals with water stress, but does not mention water quality. In a high density, growing urban area, water resources and water quality should both be addressed. As more water is required, less is available for ecosystems, more wastewater is produced, which may ultimately affect the aquatic environment. Another point that should possibly be included in the section of environmental sustainability is the risk of stress on sewage infrastructure as the population grows. This may lead to negative impacts on water quality.</p> <p>Page 27, Strategic Policy SD1 – Although this policy is directed at Sustainable Development, there is no reference to water resources / water quality. As water quality is closely related to water use, which in turn is an important part of sustainable development, consider including an additional strategic objective to help meet SD1 that is directed at water resources and water quality. For example, no development should impact negatively on the quality or status of water bodies.</p> <p>To further strengthen Strategic Policy SD1, consider including that major developments (or all developments) should set out how they address the requirements of the policy, which would be in line with a similar approach within Strategic Policy SD2.</p> <p>Page 83, 8.5 – The key issues on infrastructure provision rightly state that a critical point may soon be reached whereby a new (or upgraded) sewage treatment works may be needed. This shows that sewerage infrastructure is, or may soon be, under stress, which could negatively affect water quality. The Local Plan could be improved by linking water stress to the risk of deteriorating water quality, especially with sewerage infrastructure operating at near capacity and the risk this places on water quality in the event of failing sewerage infrastructure.</p>	<p>Para. 2.35 has been amended to include comments made in relation to water quality and sewage infrastructure.</p> <p>It is considered that the Strategic Policy SD1 is overarching and covers all requirements which are provided in more detail in the Plan. In relation to water quality, this is picked up by SD1(4): Protects, enhances and creates opportunities for Crawley’s unique Green Infrastructure and SD1(7). Policy G11 applies to Crawley’s waterway (para. 13.7). Additional reference has now been included to waterways and water bodies in the list set out in para.13.15. Furthermore, clarity will be provided in the definition of Green Infrastructure in the glossary to it applying equally to the “blue” infrastructure.</p> <p>Comment relating to developments setting out how they address the requirements of Policy SD1 is anticipated to be met by the applications’ Design and Access/Planning Statement.</p> <p>In respect of para. 8.5 this is an overarching paragraph covering all infrastructure needs of Crawley. This includes reference to “utility” facilities, and this is further clarified in para. 8.7 which makes clear reference to waste water treatment. It is considered that the Infrastructure Plan (in liaison with the waste water infrastructure providers) will highlight necessary works and impacts. This is a requirement for the providers in consultation with the EA. It is anticipated this will be assessed as part of the update of the Water Cycle Study.</p> <p>With regards to the CIL and S106 requirements, this will be explored further</p>

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			<p>Page 84 – “Where appropriate and in line with the CIL Regulations, Section 106 agreements will address site specific issues”. Considering the threat to water quality from the growing population and large developments, it may be beneficial to include water quality monitoring in section 106 agreements to ensure no deterioration of the status of water bodies, especially with large developments.</p> <p>Page 186, The section on Tackling Water Stress should reference the need to protect against deteriorating water quality.</p> <p>Page 206 - Appendix A: Sustainability Objectives have no direct reference to water resources or quality, even though water is an important aspect of sustainability.</p>	<p>through the Planning Obligations Annex and paragraph 8.9 in relation to enforcement and monitoring.</p> <p>Reference has now been included in the Policy to clarify that minimising “its impact on water resources” includes protecting against deteriorating water quality.</p> <p>Water resources and quality, in relation to water stress are captured in the Sustainability Objectives under:</p> <ul style="list-style-type: none"> <li>• Sustainability Objective 2. To adapt to the effects of climate change, by reducing the negative consequences of changes in the climate on people and the environment, or by achieving a positive outcome from the effects of climate change;</li> <li>• SO6: To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough; and</li> <li>• SO8: To ensure the provision of sufficient infrastructure to meet the requirements of the borough.</li> </ul>
REP196/807	Environment Agency	Policies IN1 & IN2	<p><b>Infrastructure Provision - Section 8</b></p> <p>The demand for new housing in the Borough is likely to result in significant built development during the lifetime of this Plan. Flood risk from all sources should be fully assessed any successfully managed as part of any further and future development. This may require the construction of infrastructure to assist in successfully managing that risk, this should be taken into account as part of considerations on this aspect for the Borough as part of the Local Plan process. This will require Crawley Borough Council to work alongside other Risk Management Authorities, as well as making provision to implement the construction and long term management of flood risk management infrastructure as necessary.</p>	<p>Noted. IN1 includes reference to the provision of infrastructure which is outside of Crawley but serving Crawley.</p> <p>The council has jointly commissioned a Water Cycle Study and Strategic Flood Risk Assessment with neighbouring authorities. Flood Risk Management is also addressed by proposed Policies EP1 and EP2.</p> <p>Noted. The council considers that the Local Plan provides a framework for approaching such issues as part of a strategic development. Policy H3g (urban extensions) (sub para. iii) identifies flooding and drainage as criteria</p>

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			<p><b>Policies IN1 and IN2</b> - As stated within the draft Local Plan, due to restriction in available areas for future growth within the Borough, there is a need for Crawley to work with adjacent Councils in order to find areas for development. The risk to flooding from any new development must be successfully managed so any development is considered safe for its lifetime, taking into account climate change, and the risk to flooding is not increased elsewhere.</p> <p>Due to the nature of flooding, the provision of infrastructure to manage flood risk may not be located on, or directly adjacent to, any development site. Fully consideration should be given within the Local Plan Policy for how this can be designed, delivered and maintained for the long term as part of any development proposal, especially if development is located in adjacent Council areas. Working closely with others is an important aspect of bringing forward any projects to reduce flood risk.</p> <p>The Council should give full consideration to how CIL could be used to support the development of flood risk management infrastructure as part of the Local Plan policy. Ensuring that CIL could be made available as part of the Regulation 123 listing for flood risk management infrastructure would be an important step in this process.</p> <p>The Infrastructure Plan contains a section related to flood defence. We recognise the information contained within this section is up to date and reflective of conversations between ourselves and Crawley Borough Council earlier this year.</p>	<p>which the council will use in engaging with adjacent authorities, developers and other stakeholders as part of the duty to cooperate. This is also identified as an issue in respect of safeguarding for a western link road (policy ST4). Flooding is also expected to be one of the strategic matters identified in the Statement of Common Ground being prepared through the Duty to Cooperate.</p> <p>The Reg. 123 List allows for expenditure of CIL on strategic flood risk management infrastructure. In addition, legal restrictions associated with the list are no longer applicable as of 1 September 2019 owing to deletion of Regulation 123 from the CIL Regulations. Noted.</p>
REP196/808	Environment Agency	Policy GAT1	<p><b>Gatwick Airport</b> - The location, topography and large areas of impermeable surfaces at the Airport result in the area being at risk to both fluvial and surface water flooding.</p> <p><b>Policy GAT1</b> – We note and welcome that the management of flooding is highlighted as part of this policy. We also welcome the reference to the need for adequate infrastructure to be part of any future development, as this includes the provision of flood risk management infrastructure. The future expansion of the Airport is likely to introduce further areas of impermeable hard standing which could increase the volume and rate of surface water runoff, and this will need to be managed as part of any future development. The Airport is also impacted by fluvial flooding, any development plans for the Airport will</p>	Support noted.

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			need to be supported by a detailed Flood Risk Assessment which sets out how flood risk elsewhere will not be increased as a result of development at Gatwick.	
REP196/809	Environment Agency	Policy H3c	<b>Policy H3c Open Spaces</b> – We welcome that, for Open Space, point vi states that ‘Flood risk will not be exacerbated elsewhere as a result of the development, and surface water drainage is maintained at greenfield runoff rate levels.’ If surface water runoff could be reduce further and additional storage introduced as part of any development proposal, this would offer a greater reduction in runoff rates from new development.	Support noted. The policy criteria vi. has been amended to include reference to “as a minimum”, and Policy EP1 will apply to development coming forward within these housing land typologies. The supporting text to Policy H3c has been amended to include explanation behind this principle.
REP196/821	Environment Agency		<b>FISHERIES, BIODIVERSITY AND GEOMORPHOLOGY</b> The plan adequately refers to the need to avoid impacts to biodiversity through development and the need to ensure that biodiversity is protected and enhanced. It also makes reference to biodiversity net gain. Further detail could be considered with regard to rivers, for which off-site compensation is not always possible or feasible, and maintains a break in the ecological corridor that the river constitutes. Ideally, all development along rivers will work towards restoring adequate buffer zones and ensuring that rivers are enhanced through all development.	Support noted. Buffers to waterways are considered in the Green Infrastructure Supplementary Planning Document
REP196/812	Environment Agency	Policies SDC1 & SDC2	<b>GROUNDWATER HYDROLOGY – WATER RESOURCES</b> <b>Draft Local Plan</b> Para 14.5 "The South East, including Crawley, is an area of extreme water stress" - we classify it as an area of "serious" water stress, but we support the case for "more stringent water efficiency measures" as elaborated in para 14.8, 14.23 and Policy SDC3. The reference of footnotes 65 and 70 is still current. Para 14.12, Policy SDC1, reiterated in SDC3 and para 14.41 - We support the requirement for new non-domestic buildings to reach the BREEAM Excellent standard for water efficiency, except where it is demonstrated that this is not technically feasible. Below para 14.26 , Policy SDC1 Questions <ul style="list-style-type: none"> <li>Do the minimum Energy and Water requirements for BREEAM ‘Excellent’ represent an appropriate standard for new non-domestic</li> </ul>	Support Noted.  Support Noted.

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			<p>buildings? If not, what (if any) benchmark or requirement should be used? - <b>Yes the water requirement is an appropriate standard.</b></p> <p>Below para 14.37, Policy SDC3, and para 14.39 - We support the water efficiency targets mentioned. The preferable target of 100 litres/person/day is consistent with long-term ambitions in Southern Water's revised draft 2019 Water Resources Management Plan (yet to be finalised).</p> <p>Paras 14.39-14.41 - We hope the proposed new Water Cycle Study will support the conclusions here taken from the previous one.</p> <p>Below para 14.43, Policy SDC3 Questions</p> <ul style="list-style-type: none"> <li>• Is the 'optional' building regulations standard for water efficiency in new dwellings still appropriate and justified in Crawley? - <b>Yes it is.</b></li> <li>• Is it reasonable and appropriate to set a more advanced aspirational target of 100 or 80 litres/person/day? - <b>Yes the 100 target is a long-term ambition set out in Southern Water's latest revised draft Water Resources Management Plan. 80 is achievable, it is more costly but more practical in new developments.</b></li> <li>• Is it appropriate and reasonable for the Policy to anticipate any future tightening of water efficiency standards by the government in relation to new dwellings? - <b>This does seem reasonable in the light of what is currently appearing in Water Company plans, and the greater national steer anticipated for the next round of plans in 2024.</b></li> <li>• Are the BREEAM requirements in respect of new non-residential buildings and extensions/ changes of use appropriate and justified? - <b>Yes, other local authorities have incorporated similar requirements, at least in respect of new developments.</b></li> </ul>	<p>Noted.</p> <p>Support Noted</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
REP196/810	Environment Agency	Policies EP1 & EP2	<p><b>Environmental Protection - Section 15</b></p> <p>It is noted that this section of the draft Local Plan states the nature of the flood risk within Crawley Borough and that any development is planned with flood risk in mind. Within the Borough of Crawley, there are areas which are at risk to fluvial flooding as the Council area is crossed by a number of designated main river watercourses. In addition, the Borough is shown to be at risk to flooding from surface water, with some areas being considered at a significant risk to surface water</p>	<p>Noted. These elements are captured within the policy, though additional wording has been added to the Reasoned Justification to make clearer the different potential sources of flood risk in Crawley.</p>

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			<p>flooding. Future development will place further pressure on the flood risk management infrastructure already in place, with provision needing to be made as part of any additional development for the successful management of flood risk. Climate change, and the predicted alterations to weather patterns this will bring, will place additional pressure on ensuring developments can be considered as safe for its lifetime. It is recognised that the Borough has a number of restrictions and constraints to future development. Flooding, and the need to provide space for water, should be recognised as a possible constraints on how future development can be brought forward.</p> <p><b>Policy EP1/EP2</b> – The supporting text setting out the reasoned justification for this Policy recognises the risk to flooding from a number of sources in the Borough, and the need to manage and control the risk to flooding as part of any proposed development. Point 15.16 is especially welcomed, and we note the comments made within point 15.18 in relation to our previous input to the three sites partially affected by flooding.</p> <p>With reference to the questions posed on Policy EP1, the explanation of when a Flood Risk Assessment or a Flood Resilience Statement are required would benefit from further explanation as currently this is not made clear within the EP1 text. It is appreciated that further information on a flood Resilience Statement is given in EP2, the Council may wish to consider making a reference within both EP1 and EP2 to where the Flood Risk Assessment and Flood Resilience Statement details can be found.</p> <p>Consideration should also be made to referencing climate change specifically within the Policies to ensure that this is factored in to any development at the start of the process.</p> <p>A separate Policy, as suggested by EP2, for small scale householder extensions does seem justified. The nature and scale of many of these types of proposal can be problematic to consider as part of a Flood Risk Assessment, so a more bespoke Policy to ensure that the flood risk associated with these types of development can be adequately consider is welcomed.</p>	<p>Noted. This is captured at Paragraph 15.16 which recognises that within Flood Zone 3, all undeveloped areas or areas of open space are defined by the Local Plan as Flood Zone 3b (functional floodplain).</p> <p>Noted and support welcomed.</p> <p>Noted. The circumstances in which a Flood Risk Assessment is required are set out in the Planning Practice Guidance: <i>Flood Risk and Coastal Change</i>, and reiterated at Policy EP1 (part iii). However, additional wording has been added to both Policies EP1 and EP2 to more clearly explain the circumstances in which a Flood Risk Assessment or a Flood Risk and Resilience Statement will be required.</p> <p>Noted. Additional text has been added</p> <p>Noted and support welcomed.</p>

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP196/816	Environment Agency		<p><b>Draft Infrastructure Plan</b></p> <p>Page 4 - "significant water stress" - our own terminology is "serious" water stress.</p> <p>Page 5 Water Supply Evidence Base - "Draft Water Resources Management Plan 2020-2070 (to be finalised December 2019)" - The latest document is the "Revised draft Water Resources Management Plan 2019, Addendum to Statement of Response", dated June 2018, and yet to be finalised.</p> <p>Page 5 Water Supply Current Findings - "Southern Water is aiming to increase the number of homes with meters from 92% to 100% in the Sussex north zone by 2025." The compulsory metering programme completes in Sussex North in 2025, when the latest plan forecasts the proportion of metered homes as 92%. 100% is not expected to be achieved. It is impractical to meter the remainder, but new homes, all metered, are expected to drive the figure up to 93% by 2030. In 2018-19, 91% of homes were reported as already metered.</p> <p>Page 5 Water Supply Current Findings - "Southern Water's Asset Management Plan to 2025, identified that its customer base is forecast to grow by 20% during 2020-45" - Would it not be better to reference the Water Resources Management Plan which covers the time period specified, and should be consistent with the Asset Management plan?</p> <p>Page 6 Current Findings (10th bullet) "Southern Water's Draft Water Resources Management Plan 2020-2070"- As above, the latest document is the "Revised draft Water Resources Management Plan 2019, Addendum to Statement of Response", dated June 2018, and yet to be finalised.</p> <p>Page 7 Sewage Evidence Base - "Thames Water Draft Water Resources Management Plan 2020-2100 (subject to DEFRA approval)" - The latest document is the "Revised draft Water Resources Management Plan 2019", dated October 2018, but both documents concern supply rather than sewage, so are only indirectly relevant.</p>	<p>Change made.</p> <p>Change made.</p> <p>Change made.</p> <p>Change made.</p> <p>Change made.</p> <p>Noted. Change made.</p>
REP196/820	Environment Agency		<p><b>Infrastructure Plan For the Crawley Borough Local Plan 2020-2035</b></p> <p>Page 7, Sewage, Current Findings – "Where capacity off-site is not available, developers should ensure that plans are in place for provision ahead of the development's occupation".</p>	<p>Amendment made.</p>

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			<p>The above statement could be improved by stating that all necessary permits should be applied for early in the development process and all permits granted and the required infrastructure and connections built prior to developments' occupation.</p> <p>The Infrastructure Plan should be updated once the new Water Cycle Study has been completed as most of the evidence base used for the sewage section of the Infrastructure Plan is outdated.</p>	Noted.
REP196811	Environment Agency		<p><b>SEA Scoping Report Draft</b></p> <p>The recognition of flooding as a specific issue that benefits from the inclusion within the Local Plan is noted, and welcomed. Policy that strengthened the requirements for all development to ensure that flood risk from all sources is managed for the lifetime of a development should be in place.</p> <p>Reference to updating the SFRA and Water Cycle Study (A14) is noted. These documents are important in understanding and clearly setting out flood risk and water management aspects and should be reflective of the most up to date information available.</p> <p>Due to the nature and extent of the flood risk within Crawley Borough, choosing to include a locally specific flood risk management policy under EP1 does seem a prudent way forward. The choice of Option 1 for EP2 would also offer a more appropriate policy direction for this type of development proposal.</p>	Support noted. Updated SFRA and Water Cycle Study is underway.
REP196/814	Environment Agency		<p><b>Sustainability Appraisal/Strategic Environmental Assessment Scoping Report and Draft Report</b></p> <p>Para A3 refs - "Thames Water Draft Water Resources Management Plan 2019 (Thames Water, 2019)" - The latest document is the "Revised draft Water Resources Management Plan 2019", dated October 2018</p> <p>Para A3 refs - "Southern Water, Water Resources Management Plan 2015-2040 (Southern Water, 2015)" - The latest document is the "Revised draft Water Resources Management Plan 2019, Addendum to Statement of Response", dated June 2018. Has this been considered?</p> <p>Para A3 refs - No reference to SES Water's plan. The latest document is "Revised Draft Water Resources Management Plan 2019", dated September 2018.</p>	Documents updated and added in paragraph A3. Updated SFRA and Water Cycle Study will assess latest evidence in Resource Management Plans.

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			<p>Para A3 refs - No reference to South East Water's plan. The latest document is "Revised Water Resources Management Plan 2020 to 2080".</p> <p>Para A17 - "significant water stress" - our own terminology is "serious" water stress. This paragraph refers to "the Plan period to 2030". That presumably was the limit of the old water cycle study.</p> <p>Para A18 "Water Supply Management Plans" – capitals</p> <p>Para A19 table for indicator A8 - The 2017/18 figures quoted here have very recently been superseded by 2018-19 data. Per capita consumption in 2018-19 was higher owing to the hot weather. "The Regional Economic Strategy target is 135 litres per day by 2016" - was? Reference could also be made here to aspirations in water company plans, especially Southern Water's "Target 100".</p> <p>Para F2 refs - "Draft Water Resources Management Plan 2019 (Thames Water, 2018), Draft Water Resources Management Plan 2019 (South East Water, 2018), Draft Water Resources Management Plan 2019 (Sutton and East Surrey Water, 2018), Water Resources Management Plan for 2015-40 (Southern Water, 2014)" - see Para A3 refs above.</p>	<p>Amendment made.</p> <p>Amendment made.</p> <p>Amendment made.</p> <p>Amendments made.</p>
REP196/818	Environment Agency		<p><b>Sustainability Appraisal / SEA (Scoping Report &amp; Draft Report)</b></p> <p>Page 13 - Water is mentioned in section A, climate change, but not in section E, the natural environment. Any growing urban area will place additional stress on the natural environment, including the aquatic environment, so this should have been highlighted in section E of the Sustainability Appraisal.</p> <p>Page 14 and Page 16 refer to water supply, sewerage and pollution. <i>"The potential for development to be concentrated in the Crawley area may lead to water supply issues"; "The potential for development to be concentrated in Crawley may lead to sewerage capacity problems"; and "Crawley's role as an economic hub and transport interchange means the town's contribution to air, land, water and noise pollution is likely to increase".</i></p> <p>Page 62 – <i>"A thorough consideration of the strategic infrastructure network is to be undertaken to ensure that development does not outstrip essential infrastructure, such as sewerage and water".</i></p>	<p>Waterways has been included in topic area E, as has reference to the fact that any growing urban area will place additional stress on the natural environment, including the aquatic environment.</p> <p>A Water Cycle study is currently being commissioned and is due to be completed February/March 2020. The Environment Agency have already been involved in this process.</p>

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			<p><i>The two sections above, Pages 14-16, and Page 62, together demonstrate the need for these issues to be adequately addressed in the Local Plan. The link between water supply and water quality (which is directly related to sewerage provision) has not been adequately addressed in the Local Plan.</i></p> <p><i>Page 21, A16 – “There is a risk that potential new strategic development and increased population, combined with the level of economic development, could exacerbate water supply issues and associated water quality and infrastructure capacity issues. Therefore, an updated Water Cycle Study will be commissioned to investigate how best the issue of water stress can be addressed”.</i></p> <p><i>Page 32, A20 – “As well as potentially adding to water supply stress, new development at Crawley will invariably take up sewerage network capacity. To establish whether there is sufficient sewage treatment and network capacity to accommodate identified levels of residential and economic growth, an updated Water Cycle Study will be undertaken”.</i></p> <p><i>A16 and A20 demonstrate the need for a new Water Cycle Study. The Local Plan should give a clear commitment when this will be completed as this will help address many of the water related issues.</i></p> <p><i>Page 163, Policy SDC3: Tackling Water Stress: “Development of a local plan policy to mitigate the impact of development on the water environment. Crawley is situated in an area of serious water stress, and recommends the local plan should include policy to help mitigate the impact of development on the water environment.</i></p> <p><i>Policy SDC3 highlights the importance of a section dedicated to water in the local plan.</i></p>	<p>Support for water stress policy noted.</p>
REP40/097	High Weald AONB Unit	Policy LC6	<p>Thank you for your consultation on the above draft Local Plan. This response focuses on Policy LC6: High Weald Area of Outstanding Natural Beauty and the associated text and map.</p> <p>The current text of LP6 is supported insofar as it goes, but it is considered that it could go further in identifying the landscape components on the small areas of land in Crawley Borough that are in the AONB. In particular there are some areas of Ancient Woodland between Pease Pottage and the A264 and the areas further north-west form part of Buchan Park and include archaeological assets. The High Weald AONB Unit can assist with providing GIS information on these</p>	<p>The location of the AONB in relation to the landscape character policy is provided in the small map under Policy CL8: Development outside the Built-Up Area Boundary. However, a more detailed insert map showing the location of the AONB boundary relative to the borough boundary, and including areas of ancient woodland has been inserted into the Plan.</p>

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			<p>areas, but it is recommended that they are surveyed on foot for landscape, biodiversity and heritage characteristics that the policy could then refer to so that it goes beyond national AONB policy to be local distinctive to Crawley.</p> <p>The visual setting of the AONB to the east is largely shielded by the M23, however there are other impacts that could affect it such as watercourses and historic routeways. Again reference to these potential impacts of development outside the AONB on the designated area would help to make this policy more locally distinctive and easy to use. The policy should be supported by a detailed inset map showing the location of the AONB boundary relative to the Borough boundary and the AONB landscape components referred to in the policy. The map on p66 is too small scale to show this effectively. AONB Unit is happy to assist with this map.</p> <p>Lastly, the reference to the High Weald AONB Management Plan should be to the latest 2019-2024 version, the previous version is referred to on p208.</p> <p>The above comments are advisory and are the professional views of the AONB Unit's Planning Advisor on the potential impacts on the High Weald landscape. They are not necessarily the views of the High Weald AONB Joint Advisory Committee. (*Background Information Attached*)</p>	<p>Policy relating to developments within the AONB is covered by Policy CL8 and CL9. More detailed assets would be considered against the other policies of the Plan in relation to landscape, ancient woodland, archaeological and biodiversity assets as part of planning application submissions.</p> <p>The surveying on foot for landscape, biodiversity and heritage characteristics would require specialist expertise.</p> <p>Noted: the reference to the High Weald AONB Management Plan to the 2019-2024 version has been updated.</p>
REP152/461	Historic England		<p>Thank you for your email of 15 July 2019 inviting comments on the above consultation document.</p> <p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit</p>	Responses provided on specific comments in later sections.

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			<p>our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate. In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the plan; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment.</p> <p>The objective of the National Planning Policy Framework, inter alia, to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 185); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 20 d)). These underpin the purpose of the planning system to achieve sustainable development.</p>	
REP152/462	Historic England	Policy SD1	<p>We are pleased that the overarching policy in this respect, Strategic Policy SD1: Presumption in Favour of Sustainable Development, includes recognition of this in bullet point 3, but we suggest the wording is changed from the neutral term 'Respect' to the more positive 'Conserve and enhance' to more accurately reflect the intention of the NPPF.</p> <p>A positive strategy in the terms of the NPPF is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.</p>	Comment noted – amendment has been made in the Policy to refer to “conserve and enhance” in conformity with the intention of the NPPF.
REP152/463	Historic England	Policy CD2	<p>We note, and support, that Strategic Policy CD2: Making Successful Places: Principles of Good Urban Design requires good design that reflects the defining characteristics of each neighbourhood within the plan area, and reinforces the existing character and distinctiveness of each; and, that the protection and enhancement of heritage assets is integral to this (bullet point a)).</p>	Support noted.
REP152/464	Historic England	Policy CD3	<p>We support Strategic Policy CD3: Local Character and Design of New Development; however, we suggest the inclusion of 'and their settings' after 'heritage assets' in paragraph 1a). The setting of an asset is often an integral part of its significance, in terms of how it is experienced and viewed, and good new development will recognise this. It would also link more directly to the subsequent sub-paragraphs (paras 1b) and c)).</p>	<p>Agreed: amendment made to Policy CL3 1a. as suggested.</p> <p>Agreed: amendment made to Policy CL3 2 as suggested.</p>

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			You may like to consider adding a reference to Conservation Area Appraisals to paragraph 2, as these may provide more specific guidance where appropriate than the broader brush Area Wide Character and Design Assessments.	
REP152/465	Historic England	Policies CD4 – CD6	The location, design and use of future development can contribute to local identity and distinctiveness, and safeguarding heritage significance. We agree that Policies CD4-CD6 set out a series of design parameters that will help to ensure that high-quality design is achieved in new development and sustainable forms of urban planning are delivered, including the protection of heritage assets.	Support noted.
REP152/466	Historic England	Policy CD8	We support Policy CD8: Advertisements in its references to considering the effects on the character of the locality, including scenic, historic, architectural or cultural value or features in sub-paragraph b).	Support noted.
REP152/467	Historic England	Policy LC1	The interrelationship between Crawley's historic development as a new town based upon development of distinct neighbourhoods and the green infrastructure and landscape of the town is well made in paragraph 5.6 on Structural Landscaping, but is not expressed explicitly in the Policy LC1: Structural Landscaping. While we support the broad intention of the policy, we believe it will benefit from inclusion of explicit mention of the significance and need to respect and plan for the conservation the historic landscape character of the town, which is at best only implied in the current drafting.	Policy LC1 (now CL6) has been updated to clarify landscaping makes a contribution to the development of the town and its neighbourhoods. However, it is not just the historic town landscaping that is important. The paragraph preceding the policy explains the historic relevant and origination to the structural landscaping.
REP152/468	Historic England	Policy LC2	We support Strategic Policy LC2: Important and Valued Views and the supporting reasoned justification that seek to protect views of heritage assets and within historic areas.	Support Noted.
REP152/469	Historic England	Policy LC5	Strategic Policy LC5: Development Outside the Built-Up Area would be improved and strengthened by reference to heritage assets and significances where appropriate; e.g. in bullet points ii, v and vi.	References made in policy.
REP152/470	Historic England	Para. 6.1	Heritage Assets section – reference in paragraph 6.1 to 'English Heritage' should be to Historic England.	Amendment made – although the document in question pre-dated the change of name.
REP152/471	Historic England	Policy HA1	We support the broad intention of Strategic Policy HA1: Heritage Assets but suggest the following amendments to strengthen the purpose of the policy and better reflect the intentions of the NPPF: Revise the final bullet point of the first paragraph to read <del>Other assets with non-designated archaeological interest, assets of equivalent significance to scheduled monuments. especially within Archaeological</del>	Support noted. The proposed text has been added as a separate bullet point, while retaining the last bullet point in order to include other non-designated assets with archaeological interest.

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			<p><del>Notification Areas in Crawley identified by West Sussex County Council</del> to reflect NPPF paragraph 194 and footnote 63.            In paragraph 2 replace 'not lost' with <i>conserved and enhanced</i> to meet the test of NPPF paragraph 194.            Add in paragraph 3 final sentence <i>the National Heritage List for England</i> before 'Historic Environment Record'.            Add to the end of paragraph 3 '<i>and other relevant sources of evidence about the significance of the assets affected, e.g. conservation area appraisals</i>'            Add into paragraph 4 – 'If, in exceptional circumstances, <i>as defined by paragraph 194 of NPPF, .....and it has been demonstrated to achieve substantial public benefits that outweigh that harm or loss,...</i>' to reflect the intention of NPPF paragraph 195.            Final paragraph should be omitted as it does not reflect NPPF paragraphs 195 and 196, but can be substituted with the amendments above.</p>	<p>Para. 194 relates specifically to designated heritage assets, and relates to the justification of loss or harm to them. It is considered that the existing text is proportionate and consistent with the NPPF given that this part of the text relates to all heritage assets.            The detailed requirements for Heritage Impact Assessments have been reworked to take account of these amendments, in a way which we believe scans better than simply making these additions and is more consistent with the CBC Local List of Planning Requirements.            This sentence has been reworked to have this effect, while bearing in mind that the section concerned is not just referring to designated heritage assets.            We note this but consider that this should be retained (in a slightly reordered form, as now included in the Regulation 19 draft) since it concerns non-designated as well as designated assets, and so goes beyond paras. 195 and 196.</p>
REP152/472	Historic England	Policy HA2	We support policy Strategic Policy HA2: Conservation Areas but suggest adding 'and enhance' after 'preserve' in bullet vi.	Amendment made.
REP152/473	Historic England	Policy HA4	Strategic Policy HA4: Listed Buildings and Structures does not fully reflect the purpose or wording of NPPF paragraphs 194 and 195 with regard to the test for the loss or harm to listed buildings. The wording of the policy should be revised to more accurately reflect that of the NPPF, particularly in regard to achieving <u>significant public</u> benefits that outweigh the harm resulting from the loss of the significance of the asset related to the grading of the building.	Noted. This section of the policy has been redrafted to reflect more closely the approach of the NPPF.
REP152/474	Historic England		In our view, the Plan should contain a policy relating specifically to the identification, protection and recording, where appropriate, of non-designated heritage assets as required by NPPF paragraph 197. This is particularly important in relation to archaeological resources that may be	Policies HA3, HA5 and HA6 relate to these matters in what we consider to be an appropriate way as regards particular classes of non-designated heritage asset. Policy HA7

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			<p>identified in the course of the planning or development of a site but that are currently unknown.</p> <p>We note with concern the lack of policies relating to the following key aspects of the historic environment:</p> <ul style="list-style-type: none"> <li>• How the plan will address particular issues relating to the condition of the historic environment, including heritage at risk and the reuse of vacant and underused historic buildings (NPPF, paragraph 185 and sub-paragraph a));</li> <li>• The means by which new development in and around designated heritage assets might enhance or better reveal their character and significance (NPPF, Paragraph 200);</li> <li>• How the archaeology of the plan area might be managed effectively (NPPF, footnote 93);</li> <li>• What implementation programmes and partners need to be identified in order to deliver a positive strategy for the conservation and enhancement of the historic environment (NPPF, paragraphs 9 and 185);</li> <li>• What indicators should be used to monitor the plan's historic environment policies' effectiveness.</li> </ul>	<p>has been added to cover archaeological heritage assets.</p> <p>We believe that the plan taken as a whole (including, in addition to the heritage chapter, policies SD1, SD2, CD1, CD2, CD3, CD4(b), CD5, CD6, CD8, LC2, LC5, LC6, EC8, EC11, EC12, TC1, TC2, TC4, H2, H3, H3(a-g), G14, ST4) incorporates 'a positive strategy for the conservation and enjoyment of the historic environment', including heritage assets at risk and vacant/ underused buildings. We do not currently have assets on the Heritage at Risk register, but are not unmindful of these issues. Further powers are available to the council in the form of Article 4 Directions, and the issue of notices in respect of particular properties. We believe the draft plan provides a sufficient policy basis to use these as appropriate. Para. 200 states that LPAs should 'look for opportunities' for such enhancements. Examples of this in the draft Local Plan are the 'Housing, Biodiversity and Heritage site' identified in policy H2, and the requirements regarding 'Valued Views' included in policy LC2. Policy HA7 also addresses this in a general sense regarding designated archaeological assets. Presumably this refers to footnote 63, concerning archaeological assets demonstrably of equivalent significance to scheduled monuments? Archaeological assets are now addressed in policy HA7. Please also see the Local List of Planning Requirements in respect of Heritage Impact Assessments and Desk-based Archaeological Assessments. Relevant 'Plans, Policies and Programmes' in respect of this topic area are identified in the</p>

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				<p>Sustainability Appraisal. Further information about CBC planning policy documents (e.g. Conservation Area Statements, Development Briefs) and their projected timescales are provided in the Local Development Scheme. Individual heritage improvement schemes are being progressed by the council. We believe the draft Local Plan policies provide a sufficient framework for these interventions and are compliant with NPPF paras. 9 and 185. Monitoring Indicators are identified in the Sustainability Appraisal. They are namely:</p> <ul style="list-style-type: none"> <li>- The Number of Listed Buildings on the Buildings at Risk Register</li> <li>- The percentage of Conservation Areas with up-to-date Appraisals (i.e. last 5 years).</li> </ul> <p>Representors may suggest additional or alternative indicators.</p>
REP152/475	Historic England		<p>We are not clear that an up-to-date evidence base exists for the historic environment elements of the Crawley Local Plan that can inform the policy framework and would assist in achieving sound and robust decisions on development affecting heritage assets. A current evidence base can inform opportunities to conserve the historic environment, such as site allocations positively addressing heritage assets at risk, and can help to ensure that development proposals avoid harming the significance of heritage assets (including effects on their setting). A Heritage Strategy or similar assessment document prepared in advance of, or alongside (if not already undertaken), the local plan can be a useful tool to amplify and elaborate on the delivery of the positive heritage policies in the Local Plan. Some local planning authorities have chosen to support their conservation strategy within the Local Plan using a topic-specific SPD.</p>	<p>The council is commissioning a Heritage Study to ensure that the evidence-base remains up-to-date. This tends to happen on a site or area specific basis – Development briefs, CA Statements, Urban Design SPD guidance on shop fronts, adverts, CA and ASLC.</p>
REP152/476	Historic England		<p>We welcome the statement within the Crawley 2035: A Vision section that 'The rich heritage which has shaped what the town is today will be respected, protected and enhanced'. We would welcome in support of</p>	<p>Amendments have been made to the Heritage policies to address this concern.</p>

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			<p>this the inclusion of policies for the historic environment in the local plan that meet the obligation for preparing the positive strategy required by the NPPF.</p> <p>However, you will note from the above comments that we do not consider the policies as currently drafted to be sufficient in this respect. There also appear to be some omissions or gaps in the draft Local Plan, noted above, that should be addressed so that the strategy to conserve the historic environment required by paragraph 185 of the NPPF can be attained. This will be a key test of the soundness of the plan and the achievement of sustainable development as defined in the NPPF when it is subject to examination.</p> <p>If you would like further advice on the content of this letter or to discuss how the draft Local Plan could be revised to better reflect the intention of the NPPF, please contact me.</p>	<p>It is hoped that the amended draft of the plan put forward for the Regulation 19 consultation addresses these concerns.</p>
REP209/933	Horsham District Council	Para. 2.29	<p>Thank you for consulting us on the Draft Crawley Borough Local Plan 2020 -2035. We are grateful for the opportunity to be able to comment on your emerging plan. Horsham District Council recognises that your authority faces considerable challenges in ensuring it can meet the future needs of Crawley within what is a tightly bound administrative area. Overall we consider that the plan has positively sought to balance the provision of those future needs with other wider objectives in a manner that contributes to achieving sustainable development. We do however have some more detailed comments on the draft document which are set out in the following paragraphs.</p> <p><b>Spatial Context and the Duty to Co-operate</b></p> <p>This Council recognises and supports the context of Crawley set out in the draft Local Plan documentation. We note the strong economic relationships that the town has with other local authorities in the Gatwick Diamond and those within northwest Sussex (i.e. Horsham and Mid Sussex Districts) in particular. Given these clear linkages, we are committed to continuing our programme of joint work on evidence base documents and continued constructive discussions as part of the Duty to Co-operate to seek to ensure that the wider needs of the area can be addressed as far as possible. As you know Horsham District Council is currently providing 150 homes per year towards meeting the unmet housing needs of Crawley in our current local plan (the Horsham District</p>	<p>Support noted.</p>

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			Planning Framework). Following the introduction of the Standard Housing Methodology our own housing requirements have increased significantly and we therefore welcome the recognition in paragraph 2.29 of the increasing challenges we all face in meeting housing needs.	
REP209/934	Horsham District Council	Para. 9.21	<p><b>Economy</b></p> <p>As you know, work is currently being undertaken to update the Employment Growth Assessment (EGA). We agree that this study will help inform the level of employment growth that is required over the plan period in both Crawley and wider northwest Sussex including within Horsham District. We note the statement in paragraph 9.21 which sets out that your Council will continue to work alongside other authorities in the Gatwick Diamond to help investigate the scope and implications of additional employment land coming forward in areas adjoining Crawley / Gatwick. Horsham District. We welcomes this approach. It should be noted that this Council is seeking to ensure that the step change in housing numbers required by government does not come forward at the expense of the opportunities for new residents to be able to live and work locally, either within Horsham District or within the wider northwest Sussex / Gatwick Diamond as a whole. We consider that it will be important to consider how best a range of high quality and complementary employment opportunities can be provided within the northwest Sussex area and Gatwick Diamond more generally.</p>	Noted. CBC will continue to liaise with HDC.
REP209/935	Horsham District Council	Policy GAT1 and Policy GAT2	<p><b>Gatwick Airport</b></p> <p>We are pleased to note that the draft Crawley Borough Local Plan recognises that Gatwick Airport Limited (GAL) has longer term aspirations as set out in their 2018 Masterplan documentation. You are of course aware that that GAL has now commenced formal consultation under the Development Consent Order (DCO) process. Although the outcome of this process is not yet known, we would wish to highlight that any growth of the airport will have impacts for Horsham District as well as Crawley Borough, and that this may ultimately have implications for our own Local Plan Review, particularly in relation to economic development and future housing growth. We would therefore welcome further ongoing discussion and joint working with you on this matter as may be appropriate.</p>	Reference to joint working to be included in para 10.13 to GAT1. The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place. Therefore, the Local Plan makes a commitment to assess, through an Area Action

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			<p>We also note your options set out in Policy GAT2: Safeguarded Land, where you state that depending upon the outcome of the Government's Aviation Strategy / and the aspirations set out in the 2018 draft Master Plan the safeguarding land will either be retained or deleted. As you will be aware, a small portion of the North West corner of Horsham district is also covered by the same safeguarding designation. The extent of this area is set out on our current Horsham District Framework Policies map. The uncertainty surrounding this matter is therefore also an issue for our Council, and we have also responded to recent consultations requesting that certainty is provided in relation to this matter. We are therefore supportive of the current approach set out in your documentation and would ask that further dialogue on this matter continues between the two authorities as we undertake our own Local Plan review.</p>	<p>Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>
REP209/936	Horsham District Council	Policy TC3 (repeated in Housing)	<p><b>Housing</b></p> <p>We recognise that your bound administrative area presents challenges in meeting the identified housing needs of Crawley in the period to 2035. We are therefore pleased to see that the draft plan has sought to identify a number of different mechanisms by which the standard housing methodology figures as calculated for Crawley Borough could be achieved. We note that this covers a range of approaches, including through increased densities, estate regeneration, the development of any surplus open spaces, town centre development and upward extensions, increased building heights and garden sites.</p> <p>What is not clear to us at this stage is the extent to which the potential yield that such approaches could generate over the plan period has</p>	<p>Support for Crawley maximising its housing delivery welcomed. Further detailed assessments of sites have been undertaken as Crawley's supply figure has been increased. Ongoing liaison with HDC will continue as part of Housing Market Area and Duty to Cooperate discussions.</p> <p>Policy TC3 is an allocation policy for the Town Centre Key Opportunity Sites. However, Policy H2 identifies the Town Centre as a Broad Location for Housing, Policy H3d sets criteria for Town Centre Sites as a housing typology,</p>

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			<p>been considered, and whether there is potential for this to assist housing delivery, particularly in the latter part of the plan period. Given the very significant levels of housing need for Crawley as well as Horsham District (and the wider north west Sussex authorities as a whole), it will be important to ensure that 'no stone is left unturned' in considering how the additional housing could be delivered. Although we recognise this may not be a straightforward exercise, we would request that further examination of the likely extent and timing of such delivery is undertaken as far as is possible. For example, it may be possible to identify older estates where renewal schemes might come forward. In addition, an examination of existing rates of loss of garden development / surplus open space together with any emerging evidence on sports and open spaces could help to predict if other land can be converted over the plan period. Further work and consideration of the potential location and extent of any densification would also be welcome to establish the potential delivery of additional housing through this mechanism. It is also suggested that the flexibility of the town centre policy TC3 could be improved by reflecting the statement in para 11.22 that the currently identified sites are not comprehensive, for example by adding wording along the lines of "or other opportunity areas which are identified" in the first line of paragraph 3.</p>	<p>and other policies in the Town Centre and Economic Growth chapters are supportive of appropriate residential development in the Town Centre.</p>
REP209/936	Horsham District Council	Policy H1	<p><b>Housing</b> We recognise that your bound administrative area presents challenges in meeting the identified housing needs of Crawley in the period to 2035. We are therefore pleased to see that the draft plan has sought to identify a number of different mechanisms by which the standard housing methodology figures as calculated for Crawley Borough could be achieved. We note that this covers a range of approaches, including through increased densities, estate regeneration, the development of any surplus open spaces, town centre development and upward extensions, increased building heights and garden sites. What is not clear to us at this stage is the extent to which the potential yield that such approaches could generate over the plan period has been considered, and whether there is potential for this to assist housing delivery, particularly in the latter part of the plan period. Given the very significant levels of housing need for Crawley as well as</p>	<p>Support for Crawley maximising its housing delivery welcomed. Further detailed assessments of sites have been undertaken and Crawley's supply figure has been increased. Ongoing liaison with HDC will continue as part of Housing Market Area and Duty to Cooperate discussions.</p>

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			<p>Horsham District (and the wider north west Sussex authorities as a whole), it will be important to ensure that 'no stone is left unturned' in considering how the additional housing could be delivered. Although we recognise this may not be a straightforward exercise, we would request that further examination of the likely extent and timing of such delivery is undertaken as far as is possible. For example, it may be possible to identify older estates where renewal schemes might come forward. In addition, an examination of existing rates of loss of garden development / surplus open space together with any emerging evidence on sports and open spaces could help to predict if other land can be converted over the plan period. Further work and consideration of the potential location and extent of any densification would also be welcome to establish the potential delivery of additional housing through this mechanism. It is also suggested that the flexibility of the town centre policy TC3 could be improved by reflecting the statement in para 11.22 that the currently identified sites are not comprehensive, for example by adding wording along the lines of "or other opportunity areas which are identified" in the first line of paragraph 3.</p>	
REP209/937	Horsham District Council	Policy H3g and Para. 12.75	<p>Our own Local Plan Review is underway, and our own Regulation 18 documentation is scheduled for consultation in February and March of 2020. Land on the edge of Crawley Borough, but within our administrative boundaries has been put forward to Horsham District Council for consideration as a future location for housing growth. At this stage, no decisions have been made in relation to these sites or any supporting infrastructure such as the proposed relief road.</p> <p>A key requirement of the NPPF is that Local Authorities ensure that they can meet their own development needs, including affordable housing provision and taking account of infrastructure provision and viability issues. This is therefore the starting point for the preparation of our own Local Plan, before we then consider how we can meet the needs of others, to ensure that we can prepare a sound plan.</p> <p>We recognise that in the event that land is allocated on the edge of Crawley that this will have impacts for the town, and presume this has influenced your thinking in the development of Policy H3g. Horsham District Council is committed to ongoing discussions with Crawley Borough during our plan preparation process.</p>	<p>Support and recognition for the purpose of the Policy is welcomed.</p> <p>CBC welcome HDC's confirmation they are committed to ongoing discussions with CBC during the preparations for the Horsham Local Plan Review.</p> <p>Suggestion agreed – Paragraph 12.75 has been moved to now come before the policy, rather than forming the first paragraph of the reasoned justification. This establishes up-front the different purpose of this policy. However, through Duty to Cooperate and positive, effective strategic planning, it is anticipated it will form a useful starting point for any future discussions regarding developments and allocations for developments on Crawley's administrative boundaries.</p>

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			We note that paragraph 12.75 states that the purpose of Policy H3g is to inform your discussions with neighbouring authorities as it relates to land outside the Crawley administrative area. This statement is welcome. However we are concerned that as this wording comes after the policy this important point may not be totally explicit to everyone who reads your plan. To ensure that the context of Policy Hg3 is completely clear, we would ask that the wording of this paragraph is brought forward and placed before the policy.	
REP205/910	Mid Sussex District Council	Policies CD4a and CD4b	<u>Efficient Use of Land and Built-up Areas</u> Mid Sussex supports policies CD4a and CD4b relating to making more efficient use of land. The Council recognises that Crawley considers it has an unmet need for housing, and welcomes the fact that Crawley is exploring mechanisms to increase housing supply, including the requirement for higher densities.	Support noted.
REP205/909	Mid Sussex District Council	Policy H1	<u>Planned Housing Growth</u> Mid Sussex has been kept informed of the updates to the Crawley and Horsham commissioned 'Strategic Housing Market Assessment', as part of the authorities continued joint working on housing matters. Mid Sussex will continue to work together with the Northern West Sussex Housing Market Area (HMA) authorities to understand the housing need within the HMA and the extent to which this can be delivered.	Noted.
REP205/913	Mid Sussex District Council	Policy H3g	<u>Urban Extensions: 'At Crawley'</u> Policy H3g: Urban Extensions and the supporting text indicates that some of Crawley's growth could be met through urban extensions. Policy H3g provides the framework by which Crawley would assess applications outside the borough boundaries but are adjacent to Crawley. Mid Sussex have a number of comments to make on this policy, which are set out below: It is unclear how this policy can be effective as it relates to land outside of the Crawley boundary. An application within Mid Sussex, for example, would not be assessed against the policies within the Crawley Local Plan. As such the criteria within the policy can only be considered to inform Crawley's response during the consultation process on an application within an adjoining authority; and this should be made clear.	Crawley is pursuing opportunities to maximise housing development within its own administrative boundaries, through identification of sites (including small sites within its own ownership) and increasing densities. It is considered Crawley is going as far as it can to meet its own needs within the tight administrative boundaries, and maintaining good quality of life levels for residents, employers and visitors and avoiding negative impacts of 'town cramming'. However, this will not meet the full housing need as required by the standard methodology and unmet need will need to be considered by

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			<p>It is not sufficiently clear what is meant by the term 'Urban Extension', both in terms of scale and location. This is important because some criteria would not apply to all developments. For example, smaller scale sites would not support a neighbourhood centre, or require a masterplan. The preparation of a Joint Area Action Plan may not be necessary in all circumstances. This is acknowledged in the supporting text but not within the policy. Through Duty to Co-Operate discussions, Mid Sussex will continue to liaise with Crawley on any sites within Mid Sussex that would have cross-boundary impacts, particularly any that are promoted to the Council as part of the District Plan Review.</p> <p>The evidence prepared to support the preparation of the adopted Mid Sussex District Plan (2014 - 2031) indicated that there was some capacity for the District to accommodate some of the unmet needs of Crawley, in addition to meeting its own housing need. As such, the Mid Sussex District Plan includes a provision to provide 1,498 dwellings to meet the unmet needs of Crawley during this period. However, until the review of the District Plan is undertaken, (scheduled to commence in 2021) Mid Sussex is unable to confirm its own housing need and the extent to which the need within Mid Sussex can be met. Therefore, at this time it is not possible to confirm the extent to which Mid Sussex can continue to meet the unmet needs of Crawley. In addition, should any sites be promoted to Mid Sussex during the District Plan review in this location, they may firstly be required to meet Mid Sussex need. It would therefore be unwise for Crawley to assume that some of its unmet need can be met in Mid Sussex.</p> <p>The Sustainability Appraisal of the MSDC District Plan (August 2016) sets out the conclusions of the 'Sustainability Assessment of Cross-Boundary Options', which assessed the unmet need of all neighbouring authorities. The evidence shows that there are strong migration and commuting links between the two authorities. These links are not constrained to the areas immediately adjacent to the administrative boundaries of the authorities. Broad locations for growth were assessed based on distance and linkages between areas based on historic commuting patterns. These broad locations cover most of Mid Sussex, which indicate any unmet need from Crawley could be located anywhere in this District. Locations 'At Crawley' may not be the most sustainable location for growth in Mid Sussex, but until work on the</p>	<p>authorities within the housing market area, as part of their Local Plan Review processes, and potentially beyond should this not then be sufficient alone. There is an acknowledgement in the Local Plan Review that properly planned urban extensions to Crawley may come forward through neighbouring authorities' own Local Plans, and these may then seek to meet unmet development needs arising from Crawley.</p> <p>Crawley Borough Council is working closely with its neighbouring authorities to consider the unmet needs of Crawley over the Plan period, including Mid Sussex. Notwithstanding this, Crawley Borough Council is aware that it is not able to direct development outside of its administrative area or set the planning policy framework for these to be considered, nor does it intend to set an "overspill" adjacent to Crawley. This is a matter for the individual authorities as part of their own Local Plan Reviews. This is set out in the agreed Position Statement (to be updated in the form of a Statement of Common Ground).</p> <p>However, the Crawley Local Plan Review acknowledges that development on the edges of Crawley's administrative boundaries has taken place over the years to varying degrees of involvement, and agreement, of CBC (including where they have been approved with outstanding objections from CBC). In such cases, much of the impact on infrastructure and strategic facilities and services, access to the countryside and visual landscape setting falls on Crawley. Crawley's proposed draft policy on urban extensions seeks to establish the expectations of the council should an urban</p>

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			<p>District Plan Review is undertaken and all broad locations and sites are assessed, it is not known.</p> <p>In this context, we cannot support the wording of paragraph H3g: Urban Extensions and paragraph 12.79 where it refers to any urban extension on the edge of Crawley and within MSDC should be meeting the unmet needs arising from Crawley.</p>	<p>extension or proposed development come forward on the borough's administrative boundaries. It also establishes CBC's clear expectations that where development is next to Crawley it should be meeting Crawley's needs (as is reflected in the Mid Sussex District Plan Policy allocation for Pease Pottage). The SHMA advises that duty to cooperate discussions should take place to inform clear policies regarding the mix of housing brought forward on sites "at Crawley" informed by the SHMA and should take into account the profile of Crawley's housing needs and consider how affordable housing will be allocated. It is considered reasonable that where sites are meeting or contributing to meeting the housing needs of Crawley, they should take account of the nature of Crawley's housing need. CBC welcomes ongoing positive and effective discussions with Mid Sussex as part of the Plan making process to agree the most appropriate approach this should take. However, CBC maintain that as there is a high housing need arising from Crawley and land is scarce, any development of land immediately adjacent to Crawley should not be used if not able to meet any of Crawley's needs at all. Mid Sussex's physical and policy constraints, and own housing needs, are acknowledged and the district's ability to meet unmet needs arising from Crawley will form part of the District Plan Review.</p>
REP120/334	Mole Valley District Council		<p><b>Economic growth</b></p> <p>The constrained land supply position in Crawley means there is also an unmet need for employment land of between 44.6 and 57.6 hectares over the Plan period (it is noted that these figures still need to be</p>	<p>Support for removing safeguarding noted. The council does not consider that the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether</p>

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			<p>refined). The unmet need for employment land is significantly affected by the uncertainty of a possible additional runway at Gatwick Airport and the need to safeguard land for this reason. It is understood that the unmet employment need could be accommodated within this area of safeguarded land in the event that the safeguarding is lifted. We support CBC in seeking to remove the current safeguarding.</p> <p>It is understood that some of the unmet business need could be met through a new business park at Horley within Reigate and Banstead, Given that the new business park would be unable to accommodate all of the unmet need, it would be helpful to receive clarification on what unmet employment land need that is likely to remain.</p> <p>There are significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area. Transport links between Mole Valley and Crawley are weak, mainly comprising rural lanes with limited capacity. The only A-road connections are the A217 and A264/A24. The A217 reduces to a single carriageway north of the CBC boundary and serves only one small settlement (Hookwood) in Mole Valley before continuing north to Reigate. The A264/24 is far from a direct route; the A264 lying to the south of Crawley and connecting to the A24 some 5km south of Mole Valley's boundary. Public transport connections are also weak, with limited or no bus service in the rural areas of Mole Valley. Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on the southern part of Mole Valley. The south eastern part of Mole Valley is also significantly impacted by flooding (Flood Zones 2 and 3).</p> <p>For the reasons outlined above, we consider that Mole Valley would be unable to accommodate CBC's unmet employment land needs owing to the identified physical and policy constraints, in conjunction with the limited available employment land within the south eastern part of the District.</p> <p>Based on current evidence, we do not believe there is any realistic prospect of Mole Valley contributing to the unmet housing or employment land needs of Crawley.</p>	<p>or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. The Regulation 19 Local Plan does not therefore retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for economic development within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area. The EGA also provides a constrained, past trends scenario of 33ha need which is the level of growth the Local Plan plans for. There is an unmet need of 21ha, and ongoing liaison is</p>

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				taking place with RBBC to determine how much of this could be met by the Horley Business Park. The poor connections and transport links from Mole Valley into Crawley are recognised.
REP120/335	Mole Valley District Council	Policy GAT2	<p><b>Gatwick Airport</b>  MVDC notes that CBC are considering extending the land safeguarded under Policy GAT2 to match the boundary proposed for Option 3 in Gatwick Airport's Master Plan (subject to resolving the safeguarding issue). Currently, MVDC safeguards a small area of land along Lowfield Heath Road to the north west of the existing runway for airport expansion purposes. The Gatwick Master Plan's proposed expanded boundary includes further land within Mole Valley. Should CBC decide to expand the area of land that is safeguarded, it would be pertinent for MVDC to follow suit and for both CBC and MVDC to safeguard land for the same boundary.  MVDC intends to hold a Regulation 18 consultation on a draft Future Mole Valley Local Plan in October of this year. We will continue to safeguard the existing parcel of land in Mole Valley for airport expansion purposes, unless CBC come to a decision before then to either expand the safeguarded area, or to remove the safeguarding policy entirely. We would be grateful if you would keep us informed on the matter.</p>	<p>Noted.  The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.  Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most</p>

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				appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.
REP120/333	Mole Valley District Council		<p><b>Meeting housing needs</b></p> <p>MVDC recognises the difficulties in delivering sustainable growth and the challenge of balancing competing environmental, social and economic pressures. We further recognise the physically constrained nature of Crawley. Nonetheless MVDC are concerned that CBC will have an unmet need of approximately 6,475 dwellings over the Plan Period (2020-2035).</p> <p>Three quarters of Mole Valley is within the Metropolitan Green Belt and is therefore heavily constrained. That includes all of the land adjacent to Crawley. In addition, further constraints include the AONB, a SAC, areas prone to flooding and other environmental constraints. MVDC is currently updating its own Local Plan and based on current assessments it is clear that it will have difficulty meeting its own housing need let alone having any spare capacity.</p> <p>Crawley is a functional component of the Northern West Sussex Housing Market Area, which includes Horsham, Mid Sussex and a small part of the Reigate and Banstead Council areas. Mole Valley does not form part of the same housing market area.</p> <p>On this basis, we do not consider that MVDC should be expected to meet any of CBC's unmet housing need. CBC have not to date requested that MVDC accommodate any of its unmet housing need because of the constraints mentioned above and differences in housing market. It would be helpful if that situation could be acknowledged. Based on current evidence, we do not believe there is any realistic prospect of Mole Valley contributing to the unmet housing or employment land needs of Crawley.</p>	<p>The different Housing Market Area (HMA) boundaries are noted – it is recognised that Mole Valley does not form a part of the main Northern West Sussex HMA. This is supported by the most recent evidence gathered as part of the Northern West Sussex Strategic Housing Market Assessment (NWS SHMA) commissioned jointly by Crawley Borough and Horsham District Councils. However, overlaps between the areas are acknowledged.</p> <p>At this point, Crawley is pursuing opportunities to maximise housing development within its own administrative boundaries, through identification of sites (including small sites within its own ownership) and increasing densities. It is considered Crawley is going as far as it can to meet its own needs within the tight administrative boundaries, and maintaining good quality of life levels for residents, employers and visitors and avoiding negative impacts of 'town cramming'. However, this will not meet the full housing need as required by the standard methodology and unmet need will need to be considered by authorities within the housing market area, as part of their Local Plan Review processes, and potentially beyond should this not then be sufficient alone. There is an acknowledgement in the Local Plan Review that properly planned urban extensions to Crawley may come</p>

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				forward through neighbouring authorities' own Local Plans, and these may then seek to meet unmet development needs arising from Crawley. Mole Valley's physical and policy constraints are acknowledged and will form part of the Mole Valley Local Plan preparation and examination.
REP85/201	National Grid		National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation. <b>Further Advice</b> National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database.	
REP/211/939	Natural England	CD6	<b>CD6 Normal Requirements of All New Development</b> We support this policy's requirement to "retain positively contributing trees" as this helps maintain valuable Green infrastructure (GI) assets and key features of the existing ecological network. Which is in line with the National Planning Policy Framework (NPPF) (paragraphs 20. 91. 150. 171. & 181.) and the Government's 25 year environment plan (chapter 3 section 3.i.). However we advise that, this policy could be used to strengthen requirements of new development to provide biodiversity net gains and Green infrastructure of later policies.	

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			<p>This policy could also be used to introduce a requirement of developments to enhance the natural capital stock of Crawley, in line with the NPPF (paragraphs 170. &amp; 171.) and the Government's 25 year environment plan.</p> <p>This could be done by adding something akin to the following wording:  <i>"g) demonstrate how they will contribute to the multi-functional green infrastructure network while also delivering measureable and robust net gains in biodiversity as set out in policies GI1 and GI 2."</i></p> <p>See Annex A for further advice on Natural Capital:  <b>Annex A – Further Advice</b>  <b>Natural capital</b>  Natural Capital is a concept which assigns monetary value to natural assets and the ecosystem services they provide, the value of natural capital assets can be from a physical products generated or the value of the service they provide.  Natural capital assets can be any asset which is natural or semi-natural, from street trees to arable fields and even whole habitats such as a woodland.  A single asset may generate is value from a number of sources; for example a woodland has a clear value as a timber product but while the woodland is growing it provides valuable services such as carbon sequestration, recreation, nutrient cycling and air/water quality management.  Incorporating natural capital concepts into the Local Plan will enable more efficient communication of Crawley's needs to developers, using the most recent environmental planning terminology. Furthermore having a larger stock of natural capital assets will be only positive for Crawley and its residents/visitors.  The requirement to incorporate natural capital into your Local Plan is driven by the NPPF in paragraphs 170. 171. As well as being a key concept within the Government's 25 year environment plan being ubiquitously mentioned throughout its length.</p>	
REP/211/940	Natural England	LC3	<p><b>LC3 Tree and Landscape Character Planting</b>  We support the requirement that landscape proposals for residential developments add at least 1 new tree or equivalent soft landscaping feature, is a good way to ensure developments provide GI assets and</p>	

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			<p>enhance the existing ecological network, in line with the NPPF and Government's 25 year environment plan the Government's 25 Year Environment Plan</p> <p>However we advise, this requirement to provide at least 1 new tree should be expanded to all developments where practical to maximise enhancements.</p> <p>Furthermore, this policy should also be amended to support planting of native trees to better enhance the existing ecological network. We recommend incorporating the following wording.</p> <p><i>"...or equivalent soft landscaping, for each new dwelling, of an appropriate native species and planted in an appropriate location."</i></p>	
REP/211/941	Natural England	LC4	<p>We support the requirement for developments to retain and replace trees, as a good method to protect existing GI assets and preserve the existing ecological network, in line with the NPPF and Government's 25 year environment plan.</p> <p>We would advise that specific mention of veteran trees could be included within this policy to strengthen their protection.</p>	
REP/211/942	Natural England	LC6	<p><b>LC6 High Weald Area of Outstanding Natural Beauty</b></p> <p>We strongly support the requirements of this policy specifically ensure the qualities and features of the High Weald AONB are protected and enhanced by development.</p> <p>We recommend that this policy could make direct mention of the specific characteristics of the High Weald AONB and could directly reference the High Weald AONB management plan to help further support development which enhances the AONB.</p>	
REP/211/943	Natural England	Policy H2	<p><b>H2 Key Housing Sites</b></p> <p>We note that the proposed sites are unlikely to have negative impacts on any designated sites.</p> <p>However, many of the proposed allocation sites encompass or are in close proximity to ancient woodland parcels. We strongly recommend any such allocations have specific requirements that any proposal must significantly conserve and enhance relevant ancient woodland parcels, in line with the aims of the NPPF (175.) and the Government's 25 year environment plan (1.4).</p> <p>For example the Forge Wood, Pound Hill allocation looks to contain many parcels of ancient woodland; these should not only be protected</p>	

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			but the development should provide enhancement measures such as native species planting to increase connectivity between parcels.	
REP211/944	Natural England	GI1	<p><b>GI1 Green Infrastructure</b></p> <p>We strongly support the requirements of this policy to conserve and enhance Crawley's GI network and GI being afforded "the highest protection".</p> <p>We also support the requirement of proposals to provide links to and create new GI.</p> <p>However, we recommend a change in wording (detailed below) for point vi to strengthen this policy.</p> <p><i>"<del>Large</del> All proposals will be required to provide new and/or create links to appropriate green infrastructure <del>where possible.</del>"</i></p>	
REP211/945	Natural England	GI2	<p><b>GI2 Biodiversity and Net Gain</b></p> <p>We strongly support this policies expectation of all proposals to encourage biodiversity and demonstrate how it will secure Net Gain, which is in line with the NPPF (paragraphs 8. 170. 174. &amp; 175.) and the Government's 25 year environment plan's aims (1.1.).</p> <p>We support your authority considering financial contributions as an effective method of delivering meaningful Net Gain for proposals which are not achievable on site. We would advise that financial contributions should still deliver like for like net gains.</p> <p>However, we recommend a change in wording (detailed below) to strengthen this policy.</p> <p><i>"All development proposals will be expected to incorporate features to encourage biodiversity <del>where appropriate.</del>"</i></p> <p>See Annex A for further advice on Net Gain</p> <p><b>Green infrastructure (GI):</b></p> <p>GI is a strategically planned and delivered network comprising the broadest range of high quality green spaces and other environmental features.</p> <p>It should be designed and managed as a multifunctional resource capable of delivering those ecological services and quality of life benefits required by the communities it serves and needed to underpin sustainability. Its design and management should also respect and enhance the character and distinctiveness of an area with regard to habitats and landscape types.</p>	

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			<p>GI includes established green spaces and new sites and should thread through and surround the built environment and connect the urban area to its wider rural landscape. Consequently it needs to be delivered at all spatial scales, accommodating both accessible natural green spaces within local communities and often much larger sites in the wider countryside.</p> <p>Incorporating GI concepts into your Local Plan will enable effective communication of your Crawley's needs to developers using the most recent environmental planning terminology.</p> <p>Further information on GI can be found in Natural England's green infrastructure guidance available at:  <a href="http://publications.naturalengland.org.uk/publication/35033">http://publications.naturalengland.org.uk/publication/35033</a></p> <p>GI is a key concept within the NPPF and the requirement to incorporate GI into your Local Plan is driven by the NPPF in paragraphs 20, 91, 150, 171, &amp; 181. As well the Government's 25 year environment plan in chapter 3 section 3.i.</p> <p><b>Natural capital</b></p> <p>Natural Capital is a concept which assigns monetary value to natural assets and the ecosystem services they provide, the value of natural capital assets can be from a physical products generated or the value of the service they provide.</p> <p>Natural capital assets can be any asset which is natural or semi-natural, from street trees to arable fields and even whole habitats such as a woodland.</p> <p>A single asset may generate is value from a number of sources; for example a woodland has a clear value as a timber product but while the woodland is growing it provides valuable services such as carbon sequestration, recreation, nutrient cycling and air/water quality management.</p> <p>Incorporating natural capital concepts into the Local Plan will enable more efficient communication of Crawley's needs to developers, using the most recent environmental planning terminology. Furthermore having a larger stock of natural capital assets will be only positive for Crawley and its residents/visitors.</p> <p>The requirement to incorporate natural capital into your Local Plan is driven by the NPPF in paragraphs 170, 171. As well as being a key</p>	

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			<p>concept within the Government's 25 year environment plan being ubiquitously mentioned throughout its length</p> <p><b>Net Gain</b>  Net Gain can refer to <i>biodiversity net gain</i>, <i>natural capital net gain</i> (also including ecosystem services like provision of clean air, water, natural beauty) or <i>environmental net gain</i> if delivering the full range of goals set out in the Government's 25 year environment plan. It can be delivered within the footprint of a development or at an alternative "offset" location. By making it a requirement for all developments in Crawley to achieve net gain it significantly improves the protection to the natural environment and minimises the negative impacts of development. Net gain also serves as a tool to ensure continuous increases in GI throughout Crawley which increases the natural capital assets of Crawley making the District an even better place to live. Net gain can be quantified and measured using the DEFRA biodiversity metric 2.0 beta on which more information can be found at: <a href="http://publications.naturalengland.org.uk/publication/5850908674228224">http://publications.naturalengland.org.uk/publication/5850908674228224</a> Any feedback on the metric should be provided to <a href="https://consult.defra.gov.uk/natural-england/the-biodiversity-metric-2-0/">https://consult.defra.gov.uk/natural-england/the-biodiversity-metric-2-0/</a> by the end of 2019.</p> <p>The requirement to incorporate Net gain into your Local Plan is driven by the NPPF in paragraphs 8. 170. 174. &amp; 175. As well as the Government's 25 year environment plan especially in chapter 1 section 1.</p> <p><b>Ecological networks</b>  These are an interconnected network of species that have various complex interactions with each other. These networks can be considered at a variety of scales such as at a landscape scale where larger habitats and species meta-populations are important or at a specific site scale where individual environmental features of a site such as hedges and ponds are important. By understanding the existing ecological networks that are present throughout Crawley it will enable better protection and enhancement of biodiversity in the District and minimise the negative impacts can developments have on the natural environment. The requirement to incorporate ecological networks into your Local Plan is driven by the NPPF in paragraphs 170. &amp; 174.</p>	

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			<p><b>Soils</b></p> <p>The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.</p>	
REP211/946	Natural England	GI3	<p><b>GI3 Biodiversity Sites</b></p> <p>We support the requirements of this policy to conserve and enhance nationally designated sites, NPPF sites and locally designated sites, in line with the NPPF (paragraphs 8. 170. 174. &amp; 175.) and the Government's 25 year environment plan's aims (1.1.).</p> <p>We also support the requirement of planning applications to provide habitat and species surveys.</p> <p>However, we recommend a change in wording (detailed below) to strengthen this policy.</p> <p><i>"To ensure a net gain in biodiversity, the following areas will be conserved and enhanced <del>where possible and</del>, furthermore the council will support their designation and management."</i></p>	
REP211/947	Natural England	SDC1	<p><b>SDC1 Sustainable Design and Construction</b></p> <p>We strongly support the requirements of this policy for all developments to respond to climate change in line with section 14 of the NPPF and a key concept of the Government's 25 year environment plan.</p>	
REP211/948	Natural England	SDC3	<p><b>SDC3 Tackling Water Stress</b></p> <p>We strongly support this policy's requirements to meet the tighter water efficiency requirements.</p> <p>However, we strongly recommend a change in wording (detailed below).</p> <p><i>"...Building Regulations optional requirement for tighter water efficiency, and should, <del>where feasible</del>, achieve a the more advanced target of 100 litres/person/day."</i></p> <p>See Annex A for further advice on tackling water stress</p> <p><b>Soils</b></p>	

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			<p>The Local Plan should give appropriate weight to the roles performed by the area's soils. These should be valued as a finite multi-functional resource which underpins our wellbeing and prosperity. Decisions about development should take full account of the impact on soils, their intrinsic character and the sustainability of the many ecosystem services they deliver.</p> <p>The plan should safeguard the long term capability of best and most versatile agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) as a resource for the future in line with National Planning Policy Framework paragraph 170.</p> <p><b>Water Stress</b></p> <p>Your Authority contains areas of Serious Water Stress as designated by the Environment Agency. For developments in Southern Water Services drinking water supply area Natural England recommends water efficiency policies should be developed to support Southern Water's "Target 100". This target, of 100 litres per person per day by 2040 is needed by Southern Water to avoid the need for water supply options that are likely to damage biodiversity or/and effect protected landscapes. For development in other companies' supply area Natural England support the Environment Agency recommendation of a maximum of 110 litres per person per day. Water efficiency measures will help reduce the current impact of water resources on the natural environment and thereby contribute to more resilient landscapes and seas in line with Natural England's conservation 21 and the Governments' aspirations for thriving plants and wildlife.</p> <p>Reducing the water we use will contribute to the Government's 25 Year Environment Plan aspirations for clean and plentiful water and to restore sustainable abstraction in rivers.</p> <p><b>Sustainable Drainage Schemes (SuDS)</b></p> <p>Larger developments should be supported and encouraged to replace antiquated surface drainage systems such as gully pots with SuDS, in accordance with best practice. These SuDS have significantly reduced impacts on surrounding water quality and contribute to Green Infrastructure and natural capital.</p>	
REP211/950	Natural England		<p><b>HABITATS REGULATIONS ASSESSMENT (HRA) COMMENTS</b></p> <p>Natural England concurs with the findings of the HRA Screening report.</p>	

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REP211/049	Natural England		<b>SUSTAINABILITY APPRAISAL (SA) COMMENTS</b> Natural England concurs with the findings of the SA scoping report and SA draft report.	
REP145/430	Network Rail		Thank you for consulting Network Rail on the Crawley Local Plan review. We note that the plan says that Network Rail is already committed to improving all four rail stations in the Borough (Crawley, Three Bridges, Gatwick and Ifield) over the plan period, with major improvements already underway at Three Bridges Station. Just to clarify; works haven't begun at Three Bridges, however we are aware of the proposed improvements. We don't have any plans for Ifield Station at this stage. This statement is correct in terms of Crawley and Gatwick improvements. Other than this, we don't have any comments on the plan at this stage.	Text amended.
REP206/916	NHS Property Services	Policy IN1	Thank you for the opportunity to comment on the above document. The following comments are submitted by NHS Property Services (NHSPS). <b>Foreword</b> NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS. <b>Overview</b> In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively. NHS Property Strategy teams support Clinical Commissioning Groups (CCGs) and Sustainability and Transformation Plan (STP) groups to consider ways the local health and public estate can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.	Policy IN1 has been amended to reflect this comment. However, examples are not listed within the policy text as the risk is that this would have to turn into a comprehensive list. The glossary identifies health facilities as coming under the definition of Infrastructure. Noted. Health facilities will be eligible for CIL contributions subject to the prioritisation of projects in accordance with the council's CIL governance process.

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			<p><b>Strategic Policy IN1 (Infrastructure Provision)</b></p> <p>NHSPS notes that infrastructure includes ‘health’ in Paragraph 8.7 of Strategic Policy IN1 (Infrastructure Provision), which seeks to protect existing infrastructure services and facilities ‘where they contribute to the neighbourhood or town overall, unless an equivalent replacement or improvement to services is provided or there is sufficient alternative provision in the area.’</p> <p>The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with the integrated approaches set out within NHS Health Estate Plans. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.</p> <p>It is important to note that there are separate, rigorous testing and approval processes employed by NHS commissioners to identify unneeded and unsuitable healthcare facilities. These must be satisfied prior to any property being declared surplus and put up for disposal or development.</p> <p>Where it can be demonstrated that NHS facilities would have their use changed, having met NHS testing and approval processes before being declared surplus, it should be accepted that this provides sufficient evidence that a facility is neither needed nor viable for its current use or other community uses and that adequate facilities, which meet the needs of the local population, are or will be made available.</p> <p>Indeed, whilst an NHS facility may sometimes require a physical replacement, this is not always the case. In some circumstances it would be possible to meet the needs of the local population through existing facilities and IN1 gives provision for this.</p> <p>However, to ensure policy IN1 is sufficiently flexible and supportive of NHS estate management priorities, the following amendment has been suggested;</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 provision, <b>for that type of infrastructure, (for example health)</b>, in the area.</p>	

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			IN1 also rightly identifies the importance of CIL and planning obligations in delivering infrastructure as part of development proposals. NHSPS would request that the Council and other partners work together to forecast the infrastructure and costs required to support the projected growth and development across the borough. A vital part of this is ensuring the NHS continues to receive a commensurate share of s106 and CIL contributions to mitigate the impacts of growth and help deliver transformation plans.	
REP206/917	NHS Property Services	Para. 8.9	NHSPS supports Paragraph 8.9, which requires developer contributions to mitigate the impacts of planned growth on existing infrastructure in the area and the recognition of the cumulative impact development can have on infrastructure. The cumulative impacts of smaller residential developments should continue to be recognised, and health facilities should be put on a level footing with affordable housing and public transport improvements, given their strategic importance, when receiving funds. NHSPS thanks the Council for the opportunity to comment on the Early Engagement Document and looks forward to working on future rounds of consultation.	Noted. The council has sought further clarification from the CCGs on the approach to health in terms of developer contributions, and no concerns were raised regarding the use of CIL for health provision.
REP197/824	Reigate & Banstead Borough Council		<u>Economic Growth</u> We note that Crawley is currently updating its Economic Growth Assessment (EGA) and that the needs set out in the draft Local Plan is based on the emerging findings from this ongoing study. At the appropriate time, we would welcome the opportunity to review and input into this study, particularly given the specific economic and employment land issues between our respective areas. We note – at paragraph 9.12 – that this EGA study will also “ <i>explore in greater detail the relationship of Horley Business Park in helping to accommodate Crawley’s unmet business land needs</i> ”. In this respect, we would direct you to our existing published evidence on this matter, notably the Strategic Employment Provision Opportunity Study (2016) and the Strategic Employment Site Economic Assessment (Chilmark, 2017). The latter of these studies specifically considers the need for the business park and its scope to meet employment needs from Crawley and other surrounding areas. Given this established, detailed evidence, we are concerned to ensure that any evidence prepared by Crawley has	CBC welcomes opportunities to continue on-going cooperation with RBBC and the EGA evidence has been shared with them for discussions to continue. The EGA recognises that the Horley Business Park is likely to meet some of Crawley’s unmet employment floorspace need. The Local Plan plans for a constrained “past trends” scenario for employment growth which cannot all be accommodated in Crawley, and Policy EC1 has been amended to state that CBC will work with neighbouring authorities to assess the scope to help accommodate Crawley’s outstanding business land needs in appropriate and sustainable locations accessible to Crawley. However, the Plan also commits the council to the preparation of a

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			<p>regard to, and is consistent with, its findings. Clearly, it also needs to be recognised that our own employment needs may evolve over the life of any development on the business park. Through the duty to cooperate, we would expect to be directly and closely involved in any evidence that Crawley prepares on this matter and would ask that you provide urgent clarity and confirmation to this effect.</p> <p>It is noted that, given constraints, the draft Plan identifies a potential shortfall in employment land supply over the longer term compared to the latest evidence of needs. In this respect, we appreciate and agree that there will need to be ongoing joint working between ourselves, and other areas within the Gatwick Diamond, on this matter. This is consistent with our own Core Strategy (para 5.5.8) which acknowledges in broad terms that as partners we will “<i>work closely...to deliver the vision of the area as an internationally recognised business location with a global future in a sustainable way, including through the exploration of options for strategic development opportunities</i>”. However, we are concerned at this stage that Policy EC1 is unduly specific in seeking to identify a hierarchy of preferred broad areas outside of Crawley for potential new strategic employment land; some of which could clearly relate to land in Reigate &amp; Banstead, without any meaningful evidence to support potential deliverability/availability of land, introducing uncertainty for all stakeholders, including communities in Reigate &amp; Banstead. We believe that, at this stage, that Policy EC1 should be limited to a clear commitment to joint working on strategic opportunities, without the specificity on locations outside of Crawley.</p> <p>Given the potential scale of unmet employment needs arising from the draft Plan, we support in broad general terms, the commitment in Policies EC1 and EC2 to make best use of and intensify existing employment sites. However, we have significant concerns regarding the suggestion in paragraph 9.36 and the questions to Policy EC3 that the employment strategy should “<i>prioritise offices over other types of employment uses</i>”, including industrial and distribution.</p> <p>In our view, such an approach would fail to provide a broad cross section of employment opportunities and is likely to lead to lower skilled, lower value uses being disproportionately “exported” to neighbouring areas. It would also likely displace uses which are genuinely unsustainable transport patterns.</p>	<p>North Crawley Area Action Plan, to consider the potential future needs of the airport alongside other development needs, including employment. Should this determine that some or all of the land currently safeguarded for airport expansion could be available for other uses, then the potential for further employment growth, in a less constrained scenario, will be considered. CBC will liaise with its neighbouring authorities during the preparation of the AAP.</p> <p>Policy EC5 (previously EC3) (Office Provision) is not seeking to promote office uses over other uses. The EGA identifies need for a minimum 27,200sqm office floorspace, and 103,700sqm industrial floorspace over the Plan period, and the Local Plan sets in place a framework that supports the delivery of both. The EGA also identifies specific qualitative issues relating to Crawley’s office floorspace, with much of the stock not of the quality/type that is sought by the market. This is serving to repress the office market in Crawley’s, and there is an opportunity for economic growth if offices of the right quality and type can be delivered.</p> <p>The policy is, therefore, seeking to encourage the delivery of Grade A offices within the Main Employment Areas. To help achieve this, the policy removes the NPPF requirement that planning applications for office development outside the Town Centre satisfy the sequential test. By removing this requirement for office uses, the Local Plan recognises that the Main Employment Areas are appropriate locations for office uses. In being positive to support high quality office uses, the policy is not seeking to</p>

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			<p>Furthermore, in respect of our own Plan, the proposed Horley Business Park allocation in our own plan (DMP – HOR9) does offer scope to accommodate unmet strategic office needs arising from Crawley but, given the allocation specifies that the site will include only “limited B1b, B1c, B8 and non-B class uses”, it offers little scope to meet absorb the greater unmet industrial and warehouse needs. In this context, we are not convinced that it is necessary for Crawley to prioritise offices over other employment uses and we are concerned that doing so would likely lead to significant displaced industrial and warehouse needs which would have no realistic prospect of being met elsewhere across the economic sub-region.</p> <p>In view of the above, we look forward to engaging with you further in the preparation of your new Economic Growth Assessment and as you finalise the economic strategy within the Plan.</p>	<p>preferentially support office uses at the expense of other business uses. Rather, it is seeking to address an identified qualitative provision issue and provide a supporting framework through which to help achieve this.</p>
REP197/826	Reigate & Banstead Borough Council	Policy GAT1	<p><u>Gatwick Airport and associated issues</u></p> <p>We note the overarching approach in draft Policy GAT1, which supports the sustainable growth of Gatwick Airport as a single runway, two terminal airport. This is broadly consistent with our own Core Strategy (Policy CS9) which supports development of Gatwick Airport within the existing boundary and existing legal limits.</p> <p>We agree that, as set out in GAT1 and paragraph 10.13, it is important that any future growth minimises the impacts of operation of the airport on the local environment and surrounding residents (including in Reigate &amp; Banstead), is supported by appropriate infrastructure and maximises benefits across surrounding authorities. We would welcome reference in GAT1 and its reasoned justification to the importance of joint working with neighbouring authorities and partners across the Gatwick Diamond through existing mechanisms such as Gatwick Officers Group (GOG), to ensure that these shared strategic objectives are achieved for all.</p>	<p>Support noted. Text of para 10.13 to be amended to reference joint working.</p>
REP197/827	Reigate & Banstead Borough Council	Policy GAT2	<p>With respect to safeguarding (GAT2), we tentatively support maintaining of safeguarded land in order to provide future flexibility; however, we stress that this should not be interpreted as Council support for a new southern runway. We do not have a particular view on the delineation of the boundary.</p>	<p>Position noted. The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a</p>

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				<p>significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place. Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, the Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure within the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>
REP197/828	Reigate & Banstead Borough Council	Policy GAT3	<p>We strongly support the approach set out in draft Policy GAT3 which seeks to ensure that airport-related parking is not provided outside of the airport boundary and that any additional parking is fully justified. This approach is aligned with policies in our own DMP (TAP2) and reflects the long-standing, cross-boundary approach to the management of parking associated with the airport in order to promote sustainable</p>	Support noted.

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			travel and minimise the adverse impacts which inappropriately located airport car parking can have on host communities.	
REP197/829	Reigate & Banstead Borough Council	Policy GAT4	We support the approach in GAT4 relating to commercial uses within the airport boundary but would welcome recognition of the need to consider impacts on the roles and function of town centres and employment areas beyond Crawley's boundaries which could equally be affected by such development.	Support noted. Policy GAT4 (now GAT3) to be amended.
REP197/825	Reigate & Banstead Borough Council	Policy TC5	<u>Retail and town centres</u> We support the town centre first approach in Policy TC5 which is consistent with national policy and the approach set out in our DMP (Policy RET5). We do however note that, in respect of considering retail impact, the policy narrowly focusses on "the town centre" which we assume to mean Crawley Town Centre. We are concerned that this may exclude consideration of potential impacts on town centres in neighbouring areas, such as Horley, which could arise depending upon the location of any out of centre proposals. We would therefore welcome clarification in the policy or reasoned justification to ensure that cross-boundary impacts are properly considered.	Noted. Policy wording and supporting text has been amended to refer specifically to Crawley Town Centre and other centres within the retail catchment.
REP197/822	Reigate & Banstead Borough Council		Thank you for the opportunity to comment on the Draft Crawley Borough Local Plan 2020-35 (June 2019). We appreciate that some of the key evidence base supporting the Local Plan is still being prepared and, therefore, not available for detailed review at this stage of consultation. Our comments below are therefore made in this context. We would of course welcome – at the appropriate time – the opportunity to input into and comment upon such evidence, particularly on matters of shared strategic importance as part of our ongoing obligations under the duty to cooperate. <u>Housing</u> We note the latest position in respect of housing needs and the likely scale of unmet needs which could arise from the Crawley Local Plan. Clearly, the scale of potential unmet needs is significant (c.6,500 homes over a 15 year period); however, we acknowledge the challenges and constraints faced by Crawley. Reigate & Banstead also faces considerable constraints, including significant extent of Green Belt, which limits our own ability to accommodate growth. Horley, which is acknowledged as sharing some	

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			<p>housing market overlaps with Crawley, is particularly constrained by large areas of land at risk of flooding both in and around the town. Our constrained nature was acknowledged and accepted through our adopted Core Strategy (2014) which recognised we were unable to fully meet our objectively assessed needs in a sustainable manner, giving rise to a shortfall of our own of over 2,000 homes over the plan period. As such, whilst we are committed to maximising housing supply, as demonstrated through our recent delivery record, and to working together to understand how housing needs can be met as fully as possible, we are not in a position at this stage to accommodate any of the unmet needs which would arise from Crawley. Whilst it is appreciated that our Core Strategy recognises that migration between our respective areas (and beyond) would continue and be facilitated within our requirement of 460 homes per annum, we would reiterate that there is no specific quantified allowance for Crawley's unmet needs within our adopted plan. We would welcome additional clarity in paragraph 2.31 to acknowledge that the new neighbourhoods currently under construction around Horley are meeting Reigate &amp; Banstead's own housing needs; as currently drafted and read in the context of the preceding paragraph, it could be interpreted otherwise.</p> <p>With respect to our housing markets, we would welcome additional clarification within paragraph 12.39 to more accurately reflect the relationships which exist between our respective areas. Whilst we acknowledge and agree that, as set out earlier in the document (paragraph 2.27), there are some overlaps between the housing markets of Reigate &amp; Banstead (which is within an East Surrey HMA) and Crawley (within the Northern West Sussex HMA), these links are localised, particularly to our southernmost settlement of Horley which shares some characteristics of the NWS HMA but is fundamentally separated from it. As drafted, paragraph 12.39 could be interpreted as suggesting a much greater degree of interaction between our housing markets than the evidence supports.</p> <p>Given the likely scale of unmet need, we welcome and support the commitment in Policy H1 to consider all reasonable opportunities for housing development and the expression of the housing requirement as a minimum figure. Allied to this, we also strongly support the proposed application of minimum density ranges (Policy CD4) to all new</p>	

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			development to support the most effective use of Crawley's constrained supply of land within the built up area. This approach is broadly consistent with the "urban areas first" strategy set out in our own Core Strategy.	
REP197/823	Reigate & Banstead Borough Council	Policy H8	<p><u>Gypsies, Travellers and Travelling Showpeople</u> Through our own Development Management Plan (DMP), we have sought to meet full need identified in our latest Gypsy &amp; Traveller Accommodation Assessment, including those households who meet the equalities definition but not necessarily the planning definitions within the Planning Policy for Traveller Sites. It is our expectation that our partners across Surrey and the Gatwick Diamond will seek to do likewise through their emerging Plans in order to ensure the needs of this group are properly planned for.</p> <p>The proposed allocations within our DMP, including provision on sustainable urban extensions, are capable of meeting our pitch and plot needs over the plan period in full; however, there is no surplus available to accommodate unmet needs from elsewhere.</p> <p>We note the latest evidence that there is no immediate need for gypsy and traveller sites within Crawley, but that a need for 10 pitches later in the plan period is likely due to household formation. It is noted that the draft Plan proposes to meet this potential need in full through the allocation of a reserve site and we strongly support this positive approach to planning for future needs. We believe that it is important that this allocation is maintained to provide flexibility, particularly the plan acknowledges that local constraints result in <i>"limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward sites themselves"</i>.</p>	
REP183/705	Rusper Parish Council	Policy H3g	<p>Rusper Parish Council would like to comment on your Local Plan Review as follows: <u>Policy H3g: Urban Extensions</u> Rusper Parish Council has concerns about the suitability of this policy in relation to Rusper for the following reasons:</p> <ul style="list-style-type: none"> <li>Your plan states that the Crawley character is a compact town within a countryside setting. If development to the west takes place the countryside would be harmed. This would impact the wellbeing</li> </ul>	Comments noted. The land promoted by Homes England is located within Horsham and will be considered as part of the Horsham District Plan review (including being assessed as part of their Sustainability Appraisal and other supporting evidence documents and subject to public consultation and independent examination). The Horsham Local Plan Review timetable can be found at:

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			<p>of both Rusper and lfield residents who enjoy open access direct to the countryside.</p> <ul style="list-style-type: none"> <li>• This area of countryside is an important habitat.</li> <li>• More information is required for the proposed Western Relief road. If this travels through Rusper the impact would be devastating to the countryside, homes and life quality of residents. Rusper Parish Council would ask to be involved in the development of this.</li> <li>• Expansion into Rusper would impact heavily on the character of Rusper, the lifestyle of its residents and its infrastructure.</li> </ul> <p>Rusper Parish Council would propose an addition to this policy that if expansion to the west is proposed that the impact assessment takes into account the effect of development here on Rusper, considering the combined effects of Kilwood Vale and Land North of Horsham. Please note that expansion to the west of Crawley does not accord with the emerging Rusper Neighbourhood Plan, which can be viewed here: <a href="https://rusper-np.org.uk/regulation-14-rusper-neighbourhood-pre-submission-plan">https://rusper-np.org.uk/regulation-14-rusper-neighbourhood-pre-submission-plan</a></p> <p>Rusper Parish Council would appreciate being part of any discussions that take place surrounding expansion to the west or a relief road.</p>	<p><a href="https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme">https://beta.horsham.gov.uk/planning/planning-policy/local-development-scheme</a></p> <p>However, the Crawley Local Plan Review acknowledges that development on the edges of Crawley's administrative boundaries has taken place over the years to varying degrees of involvement, and agreement, of Crawley Borough Council. In such cases, much of the impact on infrastructure and strategic facilities and services falls on Crawley.</p> <p>Whilst Crawley Borough Council is not able to direct development outside of its administrative area, Crawley's proposed draft policy on urban extensions seeks to establish the expectations of the council should an urban extension or proposed development come forward on the borough's administrative boundaries. Furthermore, Crawley Borough Council is working closely with its neighbouring authorities to consider the unmet needs of Crawley over the Plan period, including working with Horsham District Council in respect of considering the promotion of the land to the west of Crawley by Homes England.</p>
REP131/365	Southern Water	Policy IN1	<p>Southern Water supplies potable water to the majority of the urbanised area of Crawley Borough. In this regard, please find our responses to consultation questions in respect of specific policies set out below.</p> <p>Strategic Policy IN1 – Infrastructure Provision (p84)</p> <p>→ <i>Is the approach taken by this policy in respect of the infrastructure demands arising from development, and direct impacts of development on infrastructure, appropriate and justified?</i></p> <p>This policy is both appropriate and justified, as it is important to ensure that there is adequate water supply infrastructure to serve new development in order to ensure the level of service to existing customers is not adversely impacted.</p>	Support noted.

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			<p>→ <i>Are there ways in which the policy can/should provide further clarification regarding the relationship between different types of developer contributions?</i></p> <p>Network reinforcement, required as a result of new development, is funded through the new infrastructure charge, introduced in April 2018. There is currently a charge to developers of £200 per property, however this charge is waived for water efficient development. Details can be found on our website <a href="https://www.southernwater.co.uk/infrastructure-charges">https://www.southernwater.co.uk/infrastructure-charges</a>. NB charges are reviewed annually.</p>	
REP131/366	Southern Water	Policy IN2	<p>Policy IN2 – The Location and Provision of New Infrastructure (p85)</p> <p>→ <i>Is this policy justified and necessary?</i></p> <p>This policy is both appropriate and justified, as it is important to ensure that new or improved water supply infrastructure can be provided as required during the lifetime of the Local Plan. This will help to ensure timely provision of additional capacity to meet the demand arising from new and existing development.</p>	Support noted.
REP131/367	Southern Water	Policy H2	<p>Strategic Policy H2 – Key Housing Sites (p140)</p> <p>For information purposes, we would highlight that our assessment of the proposed development sites revealed that there are pipelines under the following sites that will need to be taken into account when designing the proposed developments;</p> <ul style="list-style-type: none"> <li>Forge Wood, Pound Hill</li> <li>Zurich House, East Park</li> <li>Upper Floors, 7 – 13 The Broadway &amp; 1 - 3 Queens Square, Northgate, Crawley</li> <li>Breezehurst Drive Playing Fields, Bewbush</li> <li>102 – 112 London Road &amp; 2 – 4 Tushmore Lane</li> <li>116 – 136 London Road</li> <li>Oak Tree Filling Station, 114 London Road</li> <li>Telford Place, Three Bridges</li> <li>County Buildings</li> <li>Land North of the Boulevard</li> <li>Crawley College</li> </ul> <p>Easements would be required, the width being dependent on existing pipe sizes and depths. Any easement should be clear of all proposed</p>	Noted.

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			buildings and substantial tree planting. Developers of these sites should contact Southern Water for further information.	
REP131/368	Southern Water	Policy SDC1	<p>Strategic Policy SDC1 – Sustainable Design and Construction (p180)  → <i>Do the minimum Energy and Water requirements for BREEAM ‘Excellent’ represent an appropriate standard for new non-domestic buildings? If not, what (if any) benchmark or requirement should be used?</i>  Southern Water supports the council’s aim to require minimum BREEAM ‘Excellent’ standards for water for non-domestic buildings.</p>	Support Noted.
REP131/369	Southern Water	Policy SDC3	<p>Strategic Policy SDC3 – Tackling Water Stress (p186)  → <i>Is the ‘optional’ building regulations standard for water efficiency in new dwellings still appropriate and justified in Crawley?</i>  Crawley is within an area of serious water stress, as identified by the Environment Agency. It is therefore appropriate to apply the optional building regulations standard of 110 l/p/d water efficiency for new development as a minimum standard. Southern Water is encouraging developers to meet or exceed this standard by waiving the new connection charge for water efficient development (<a href="https://www.southernwater.co.uk/infrastructure-charges">https://www.southernwater.co.uk/infrastructure-charges</a>)  → <i>Is it reasonable and appropriate to set a more advanced aspirational target of 100 or 80 litres/person/day?</i>  Southern Water supports this approach as it aligns with our own ‘Target 100’ water efficiency programme. Target 100 is our long-term plan to reduce daily water consumption to 100 litres per person by 2040, with a mid-term target of 120 litres by 2025 (from current consumption rates of around 129 litres). In turn, Southern Water plans to reduce the amount of water lost through leakage from our pipes by 15% by 2025 and by 40% by 2050.  In addition, higher standards of water efficiency in new development will equate to greater long term sustainability – with the potential to delay or reduce the need to increase abstraction or find new sources of water supply, which in turn will help to minimise impacts on the environment and save customers’ money.  We would add that in conjunction with measures to improve water efficiency, the policy should also seek to protect existing water resources, by ensuring new development does not have an</p>	<p>Support Noted.</p> <p>Policy SDC3 amended.</p>

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			<p>unacceptable impact on the quality and potential yield of ground and surface water sources.</p> <p>→ <i>Is it appropriate and reasonable for the Policy to anticipate any future tightening of water efficiency standards by the government in relation to new dwellings?</i></p> <p>Scientific research around climate change and its predicted impacts is continuously evolving, and in tandem with this is an ongoing requirement to increase water supplies to meet the needs of a growing population. It is therefore important to ensure that water efficiency policies can quickly adapt to any changes to the predicted future availability of water in the environment. Southern Water therefore supports the council's approach as it will enable this policy to automatically align with any future tightening of government standards on water efficiency.</p> <p>→ <i>Are the BREEAM requirements in respect of new non-residential buildings and extensions/ changes of use appropriate and justified?</i></p> <p>It is important that not only residential, but all new development should be required to meet higher standards of water efficiency. Without a comprehensive approach, it will be more difficult to achieve meaningful savings.</p>	
REP150/450	Sport England	1.14	<p>Thank you for inviting Sport England to review the draft local plan. Sport England is current working with Crawley Borough Council (CBC) on the Playing Pitch Assessment and Indoor Sports Study which are mentioned in 1.14 page 11 of the draft local plan (DLP).</p> <p>The current documents which are referenced in the Background Studies and Evidence Base Documents (pages 209 – 213), i.e. The Crawley PPG 17 Open sport and Recreation Assessment (2008), <i>The Crawley Playing Pitch Strategy for Outdoor Sports (2005)</i> and the <i>Crawley Playing Pitch Assessment (2013)</i>, are in my opinion not sound. It is anticipated that the joint work we are doing with CDC will be completed in Spring 2020 and will ensure that Crawley has a sound evidence base for sport.</p> <p>An advantage of carrying out the work following the Sport England methodology is that it advises that annual reviews of the studies known as Stage E meetings which will assist in the monitoring and review.</p>	Noted. The Playing Pitch Strategy and Indoor and Outdoor Sports Facilities Strategy are underway, alongside the Open Space, Sport and Recreation Study. Sport England's involvement is welcomed.

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REP150/451	Sport England	Vision	Sport England supports Crawley's vision, in particular that <i>Crawley's parklands and open spaces, its sporting, and leisure facilities along with its cultural offer will be enhanced, for the benefit of local people and visitors</i> . The council is to be commended for making such a bold statement on the commitment of enhancing the area with sporting and leisure facilities.	Support noted
REP150/453	Sport England	Wellbeing & Communities page 33	Sport England supports the aims set out in the Wellbeing & Communities on page 33 of the DLP.	Support noted
REP150/452	Sport England	Policy SD2	I would like to make a couple of observations on <i>Strategic Policy SD2: Enabling Healthy Lifestyles and Wellbeing</i> . Sport England & Public Health England's Active Design guidance <a href="http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/">http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</a> sets out established guidance on how the design and layout of new developments can be planned to make communities more active and healthier and some of the principles in this guidance could be referenced in the policy. This is in line with Section 8 promoting healthy and safe communities in the revised NPPF. The policy or the supporting text could also make reference to the expectation that development will accord with the guidance in the Essex Design Guide. The latest review of the guide: <a href="https://www.essexdesignguide.co.uk">https://www.essexdesignguide.co.uk</a> which covers the full range of residential urban design guidance matters has embedded Active Design principles throughout the guidance. The supporting text to the policy should refer to the Essex Design Guide and/or the Active Design guidance to signpost applicants to detailed advice.	Reference to the Sport England and Public Heath Active Design guidance has been referenced in the Reasoned Justification supporting the Policy (para. 3.16). This has included setting out the "Ten Principles of Active Design" and providing the weblink.  The principles in Essex guide will be considered to be incorporated into the Urban Design SPD Review where useful and relevant. Reference has been made to this, including the link, in the Reasoned Justification supporting the Policy (para. 3.16).
REP150/454	Sport England	Policy CD2 & CD3	Again, with reference to <i>Strategic Policy CD2: Making Successful Places: Principles of Good Urban Design and Strategic Policy CD3: Local Character and Design of New Development</i> , I believe the inclusion of Active Design, as mentioned above will strengthen these policies.	Comment noted. Reference to 'active travel' has been included into Policy CD2g).
REP150/455	Sport England	Policy CD3	With regards to <i>Strategic Policy CD3: Local Character and Design of New Development</i> , Sport England produced specialist design guidance many years ago to ensure that all sections of the community could easily access every type of sports building:	Detailed design guidance can be considered later as part of any review of the Crawley Urban Design SPD.

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			<a href="https://www.sportengland.org/media/4508/accessible-sports-facilities-2010.pdf">https://www.sportengland.org/media/4508/accessible-sports-facilities-2010.pdf</a> I would advise that this document is referenced as a design document.	
REP150/456	Sport England		Sport England is supportive of principles in the <i>Open Space, Sport and Recreation</i> section. This will be better underpinned when the new studies mentioned at the beginning are completed and adopted.	Support for policies OS1 – OS3 in relation to Open Space, Sport and Recreation noted. The study review is expected to be completed by mid-2020.
REP150/457	Sport England	Policy OS1	<i>Strategic Policy OS1: Open Space, Sport and Recreation</i> , is basically from the NPPF paragraph 97, but I welcome the final paragraph of the policy: <i>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.</i> I would also suggest that the site should be tested in the market place to gauge interest from other sports and community groups to use the site, but the valuation should be for D2 use, not the hope value of the site.	Support Noted.
REP150/458	Sport England	Policy OS2	Sport England supports <i>Strategic Policy OS2: Provision of Open Space and Recreational Facilities</i> .	Support noted
REP150/459	Sport England		Sport England supports Crawley's <i>Economic Growth &amp; Social Mobility</i> vision as set out on page 88. I would like CBC to consider the following when assessing uses within employment land: Sport makes a huge contribution to the lives of individuals, to the economy and to society. Sport England has undertaken research to examine the economic value of sport in England. The main conclusions are: In 2010, sport and sport-related activity generated Gross Value Added (GVA) of £20.3 billion – 1.9% of the England total. This placed sport within the top 15 industry sectors in England and larger than sale and repair of motor vehicles, insurance, telecoms services, legal services and accounting Sport and sport-related activity is estimated to support over 400,000 full-time equivalent jobs – 2.3% of all jobs in England. Sport also generates a range of wider benefits, both for individuals and society.	Noted. The Local Plan recognises that the sport and recreation industry makes an important contribution to the Crawley economy. This is reflected in the Economy Chapter of the plan which specifically designates Broadfield Stadium and K2 Crawley as a Main Employment Area.  Within the Main Employment Areas, the Local Plan applies a flexible approach that supports a range of economic growth, including through commercial sport and leisure. The Plan also recognises that Crawley Town Centre itself provides an important commercial recreational and leisure offer, and also provides flexibility for commercial sport/recreational uses at

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			<p>The benefits of playing sport include the well-being/happiness of individuals taking part, improved health and education, a reduction in youth crime, environmental benefits, stimulating regeneration and community development, and benefits to the individual and wider society through volunteering</p> <p>Consumption of sport benefits include the well-being/happiness of spectators, and the national pride/feel good factor through sporting success/achievement.</p> <p><b>Sport England's Economic Value of Sport – Local Model (updated Nov 2015)</b></p> <p>All local authorities in England can demonstrate how sport benefits their economy using our new Economic Value of Sport – Local Model. The model produces area based (local authority, county sport partnership and local enterprise partnership) estimates on sports' contribution to the local economy in the form of business output (GVA) and jobs plus wider benefits like health. I am attaching a copy of the model for Crawley Borough Council which can be found at <a href="https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/economic-value-of-sport/</a></p> <p>Some of the key headlines for the Crawley are: It is estimated that there are 852 jobs created as a result of participation in sport in the District at GVA of £31.1m <a href="https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/">https://www.sportengland.org/our-work/partnering-local-government/tools-directory/economic-value-of-sport-local-model/</a> The total direct economic value of sport to the District as whole is £50.3m with a total employment of 1289 people. This is interesting because referring to nomis <a href="http://www.nomisweb.co.uk/reports/lmp/la/1946157342/report.aspx">http://www.nomisweb.co.uk/reports/lmp/la/1946157342/report.aspx</a>, they suggest that the latest figures indicate that 1,250 people were employed in the Arts, Entertainment and Recreation Industry (section) in 2017. This equates to 1.3% of the working population, which is the same number as people employed in the Electricity, Gas Steam and Air Condition Supply and more than employed within Water Supply, Sewage Waste Management and remediation Activates, Real Estate and Other Service Activities.</p> <p>Non-participation GVA of sport (spectating, gambling etc.) is estimated to be £18.2m, creating 437 jobs. Another benefit of sport is the £49.4m</p>	<p>Manor Royal Business District where these are of a scale and function that supports, and does not undermine, its established business role and function.</p>

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			<p>in health savings, £11.9 in volunteering and a further £5.9m in wider spending.</p> <p>Another impact which should be considered is sport's education and mentoring programs for young people which are continually highlighted for their success in engaging with low achievers at school and equipping them with jobs and qualifications, which other employment sectors have not been able to achieve:</p> <p><a href="https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/">https://www.sportengland.org/research/benefits-of-sport/social-value-of-sport/</a></p> <p>It is Sport England's contention that the Crawley Borough Plan should consider D2 sports uses, e.g. fitness clubs, gyms, climbing centres and five aside centres, to be acceptable on employment sites, as they do create sustainable employment opportunities and provide work experience and qualifications in cases for the less academically inclined.</p> <p>When sports facilities are designed in as part of an employment park e.g. Wolverhampton Business Park or Harwell Science Park, it creates a better and more sustainable working environment and therefore an attractive area for business to locate in or relocate to.</p> <p>It should also not be overlooked that there are usually more employment opportunities generated through a commercial gym, e.g. David Lloyd Gyms or commercial football like Football First, or a gymnastics club D2 use, than a 500,000m2 B8 use.</p> <p>In conclusion, Sport England wishes the Crawley Borough Plan to acknowledge that commercial sports (not retail) are a Bona Fide use on Industrial and Business parks creating employment as well as inputting into the local economy. Therefore, they should be treated like any other business when applying for planning permission for change of use or new development on sites covered in this Plan.</p> <p>I trust that my suggestions and comments will be given due consideration. However, if you require any clarification on any of the issues raised, please do not hesitate to contact me.</p>	
REP147/434	Surrey County Council	Para. 6.1 – 6.4	<p>Our heritage comments reflect SCC's position as archaeological advisors to Crawley Borough Council (CBC).</p> <p><b>Heritage</b></p>	<p>This has been redrafted to provide a more accurate summary of Crawley's archaeology. Policy HA7 has been added to provide specific coverage of archaeological heritage assets.</p>

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			<p>We would strongly recommend revisiting the introductory section (paragraphs 6.1 – 6.4), which misunderstands the archaeology of the area and omits key periods including the Palaeolithic, Mesolithic, Roman and Medieval. CBC could consult SCC or the WSCC Historic Environment Record (HER) in order to have this section drafted more accurately.</p> <p>Part of the section also relies on the Borough's 2008 Heritage Strategy however, apart from providing HER access, this relationship with WSCC for archaeological advice has now been dissolved and advice is now sought from an external provider on a case-by-case basis. As a result, there is a lack of strategic coverage for archaeology; the Local Plan could be more robust on its archaeological position and policy statements to ensure the Borough remains compliant with national planning policy and guidance.</p>	
REP147/435	Surrey County Council	Policy HA1	<p><b>Strategic Policy HA1: Heritage Assets</b></p> <p>In order to set out the clear operation of the policy in practice, the policy itself should specify in what circumstances a Heritage Impact Assessment or an archaeological Desk Based Assessment would be required. It is also not made clear why Historic England "Level 2" is the minimum acceptable level of recording structures: this determination should be made on a case-by-case basis, and this level of recording is not appropriate for archaeological heritage assets - which is not clarified. In addition, Scheduled Ancient Monuments and Other Assets should be given their own specific archaeological policy to better accommodate their individual special requirements. This would provide clarity for developers and residents in line with Crawley's other Heritage Assets listed in the policy.</p> <p>In response to the five questions posed on p.71, our responses are as follows:</p> <ol style="list-style-type: none"> <li>1. Yes.</li> <li>2. Natural environment heritage assets such as Ancient Woodland, Veteran Trees and Hedgerows should be added to the list to ensure that should development proposals affect these features, they can be considered for their heritage value within written assessments, as well as their environmental contribution.</li> </ol>	<p>The policy text and Reasoned Justification in relation to recording have been amended to clarify that the recording level/scheme of investigation must be agreed with the council. Policy HA7 has been added to provide specific coverage of archaeological heritage assets. Text added to the Reasoned Justification of HA1 acknowledging that Ancient Woodland/Veteran Trees can have or contribute to heritage significance and should be considered as part of HIA where appropriate, even though other strong protections may also be applicable. See additional policy HA7 in respect of archaeology.</p>

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			<p>3. The policy does not adequately reflect national planning policy as the archaeological coverage is thin and conflated with Heritage Impact Assessments.</p> <p>4. No comments.</p> <p>5. The requirements for the production of an archaeological assessment should be set out more clearly as we've outlined above and as they are in the validation documents.</p>	
REP147/436	Surrey County Council	Policy HA4	<p><b>Strategic Policy HA4: Listed Buildings and Structures and Strategic Policy HA5: Locally Listed Buildings</b></p> <p>Strategic policy HA4 and HA5 both demonstrate a requirement to record Listed Buildings and Locally Listed Buildings to Historic England "Level 4" should demolition be proposed. However, similar to strategic policy HA1, further justification of this is required as this is usually a determination that should be made on a case-by-case basis. In response to question 3 on p.76, there is no specific need to include Listed Buildings provisions where demolition is required as these can be dealt with through the Conservation Area process or Listed Buildings legislation and guidance.</p>	<p>The policy text in each case has been altered to state instead that the scheme of investigation is to be agreed with the council and proportionate to the importance of the asset and the nature of the impact, in line with NPPF para. 199.</p> <p>Demolition of an unlisted building in a Conservation Area requires planning permission, CA consent no longer applying in England. Provisions in respect of Listed Buildings have been amended to refer to 'substantial loss or harm' for consistency with the NPPF, enabling the decision-maker to weigh impacts in relation to the benefits or justification of a proposal.</p>
REP147/437	Surrey County Council	Policy HA6	<p><b>Strategic Policy HA6: Historic Parks and Gardens</b></p> <p>In response to question 1 on p.77, as Crawley has no nationally Registered Parks and/or Gardens, we would question whether this policy is necessary. Instead, we suggest that Strategic Policy HA3 could be amended and reinforced to include the class of locally-significant sites that Strategic Policy HA6 is designed to cover.</p>	<p>Noted. However, we believe that the ASLC designation and the Historic Parks and Gardens designation are sufficiently different to justify distinct policies. The risk of consolidating them into a combined policy is that the policy may either become too vague, or too unwieldy.</p>
REP147/438	Surrey County Council		<p><b>Early Years Education Provision</b></p> <p>Our Early Years comments are based on the vast majority of new housing to be delivered through the new Forge Wood neighbourhood in the north east of the borough. There are 2 full day care nurseries within 1.1 miles of the West Sussex/Surrey border in the north eastern area of Crawley. There are 6 other settings in this area which are extended day care provisions that offer a combination of different sessions running between 8am – 3pm.</p>	<p>The Forge Wood neighbourhood already has planning permission and includes provision for Early Years Education as part of the Community Centre which will be delivered as part of the development.</p> <p>More widely developer contributions can be sought towards Education facilities as part of a</p>

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			Early Years census information indicates that our full day care settings (8am-6pm) in the north east of Crawley were running at an average of 50% full in January 2019. Therefore there is potential capacity to accommodate additional children within a full day care setting. Most of the extended day care settings (9am-3pm) in the same area are operating at near capacity. There is sufficient childcare for extended day care at this current time but the settings could not withstand any additional pressure from development close by. Therefore SCC would expect any developer to contribute towards early years provision should any development within Crawley generate an additional need.	planning permission. This could be in the form of CIL or S106. The position set out in the Planning Obligations Annex for the draft Regulation 19 consultation Local Plan review document is to seek S106.
REP147/433	Surrey County Council		<b>Highways</b> Our highways comments concern the A23 and B2036, two of the main roads running through Crawley into Surrey. The plan includes about 1400 dwellings within the Pound Hill North and Forge Wood ward located west of the B2036. Such development at Pound Hill North and Forge Wood would have an impact on the B2036 which crosses into Surrey at Horley up to the junction with the A23 at the Chequers junction north of Horley. The enhanced employment opportunities at Manor Royal would also lead to additional traffic on the A23, with impacts at the Chequers junction north of Horley. Any development proposals would have to include an assessment of vehicle movements on the B2036 and A23 into Reigate and Banstead. Furthermore, wider Transport Assessment should take place before committing to strategic sites. The process should include the cumulative assessment of committed developments in southern Reigate and Banstead, Mole Valley and Tandridge along with any known implications of the Gatwick expansion proposals.	The Transport strategy and modelling is to be updated and will assess the cumulative impacts of planned developments beyond Crawley. Liaison with SCC will form part of this work.  The Forge Wood development is already permitted and under construction with over 1000 properties already occupied.
REP22/059	Thames Water	5.18	We support paragraph 5.18. We recognise the environmental benefits of trees and supports increased tree planting. However, in order for the public sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.	Support noted. For clarity, this paragraph has been repeated in the supporting text to the tree replacement policy (now Policy DD6).
REP22/057	Thames Water	Policy IN1	<b>General wastewater [and water supply] infrastructure comments</b> We support Policy IN1 in principle, but consider that it should be improved in relation to water supply and wastewater/sewerage infrastructure.	'In Principle' Support Noted. See comments below.

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			<p>Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure.</p> <p>Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure.</p> <p>A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), July 2018, states: <i>“Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater...”</i></p> <p>Paragraph 28 relates to non-strategic policies and states: <i>“Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure...”</i></p> <p>Paragraph 26 of the revised NPPF goes on to state: <i>“Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary....”</i></p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on ‘water supply, wastewater and water quality’ and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that <i>“Adequate water and wastewater infrastructure is needed to support sustainable development”</i> (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p>It is important to consider the net increase in water and wastewater demand to serve the development and also any impact that developments may have off site, further down the network. The new</p>	<p>The council has commissioned an updated Water Cycle Study in conjunction with neighbouring authorities to provide a clearer view of infrastructure requirements for water supply and sewage which are likely to arise over the Local Plan period, and of the deliverability of the growth strategy set out in the Local Plan.</p> <p>Amendments have been made to Policies IN1 and H3g in respect of the phasing of infrastructure in relation to development. It is noted that concerns regarding the phasing of waste-water infrastructure, as set out in the table accompanying this representation, relate specifically to the new Forge Wood neighbourhood, which remains Crawley’s only strategic site. This site already has outline planning permission, with reserved matters approval also having been granted in respect of over two-thirds of the development, and with over one third having already been built.</p> <p>Allocation of residual land in Forge Wood is proposed for a further 150 dwellings, with any further significant development north of Forge Wood likely to depend upon the progress of the proposed Area Action Plan for North Crawley. The projected phasing of residential development in Forge Wood and elsewhere is set out in Policy H2 and in the Housing Trajectory accompanying the plan.</p> <p>It is anticipated that the updated Water Cycle Study will identify any further amendments required to the Infrastructure chapter of the Plan in respect of the phasing of development and waste water infrastructure upgrades.</p>

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			<p>Local Plan should therefore seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Thames Water will work with developers and local authorities to ensure that any necessary infrastructure reinforcement is delivered ahead of the occupation of development. Where there are infrastructure constraints, it is important not to under estimate the time required to deliver necessary infrastructure. For example: local network upgrades take around 18 months and Sewage Treatment &amp; Water Treatment Works upgrades can take 3-5 years.</p> <p>The provision of water treatment (both wastewater treatment and water supply) is met by Thames Water's asset plans and from the 1st April 2018 network improvements will be from infrastructure charges per new dwelling.</p> <p>As from 1st April 2018, the way Thames Water and all other water and wastewater companies charge for new connections has changed. The changes mean that more of Thames Water's charges will be fixed and published, rather than provided on application, enabling you to estimate your costs without needing to contact us. The services affected include new water connections, lateral drain connections, water mains and sewers (requisitions), traffic management costs, income offsetting and infrastructure charges.</p> <p>Information on how off site network reinforcement is funded can be found here <a href="https://developers.thameswater.co.uk/New-connection-charging">https://developers.thameswater.co.uk/New-connection-charging</a></p> <p>Thames Water therefore recommends that developers engage with them at the earliest opportunity (in line with paragraph 26 of the revised NPPF) to establish the following:</p> <ul style="list-style-type: none"> <li>• The developments demand for water supply and network infrastructure both on and off site;</li> <li>• The developments demand for Sewage/Wastewater Treatment and network infrastructure both on and off site and can it be met; and</li> <li>• The surface water drainage requirements and flood risk of the development both on and off site and can it be met.</li> </ul> <p>Thames Water offer a free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on</p>	

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			<p>Thames Water's free pre planning service are available at:  <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p> <p>In light of the above comments and Government guidance we consider that the New Local Plan should include a specific policy on the key issue of the provision of water and sewerage/wastewater infrastructure to service development. This is necessary because it will not be possible to identify all of the water/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (Asset Management Plans or AMPs). We recommend the Local Plan include the following policy/supporting text:</p> <p><b>PROPOSED NEW WATER SUPPLY/WASTEWATER INFRASTRUCTURE POLICY TEXT:</b></p> <p><b><i>“Where appropriate, planning permission for developments which result in the need for off-site upgrades, will be subject to conditions to ensure the occupation is aligned with the delivery of necessary infrastructure upgrades.”</i></b></p> <p><b><i>“The Local Planning Authority will seek to ensure that there is adequate water and wastewater infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development.”</i></b></p>	
REP22/08	Thames Water	IN2	<p>We support Policy IN2 in principle, but consider that it should be improved in relation to water supply and wastewater/sewerage infrastructure.</p> <p>Local Plans should consider the requirements of the utilities for land to enable them to meet the demands that will be placed upon them. This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in the AMP6 period which runs</p>	<p>Clause added to Policy IN2 relating to long/medium term resilience of infrastructure. Otherwise the wording included in the Regulation 19 draft seems at least as supportive as proposed here.</p>

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			<p>from 1st April 2015 to 31st March 2020 and does not therefore cover the whole Local Plan period. AMP7 will cover the period from 1st April 2020 to 31st March 2025. The Price Review, whereby the water companies' AMP7 Business Plan will be agreed with Ofwat during 2019.</p> <p>We therefore request that the new Local Plan include the following policy/supporting text:</p> <p><b><i>"The development or expansion of water supply or waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, 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 impact that any such adverse impact is minimised."</i></b></p>	
REP22/529	Thames Water	Policy GAT2	<p>Further to our letter dated 2nd August we would like to make the following additional comments:</p> <p><b>Strategic Policy GAT2: Safeguarded Land Consultation Questions: Should the Local Plan 2035 continue to safeguard land for a future wide-spaced runway at Gatwick Airport, or not? Why do you think this?</b></p> <p>We support Option 2 to delete the Gatwick Airport Safeguarded Land policy.</p> <p>The safeguarded area includes Thames Water's Crawley Sewage Works and therefore is directly affected by Policy GAT2 which provides uncertainty in relation to future upgrades at the sewage works.</p> <p>There are currently no approved plans for an additional runway at Gatwick Airport and this does not form part of the Government's Aviation Strategy and therefore the safeguarding should be removed.</p> <p>The consultation sets out at paragraph 10.21 that if the safeguarding is removed "...the council will consider appropriate land uses across the whole area, potentially through an Area-wide Action Plan. Individual applications in this area in advance of the conclusion of that work will be considered to be premature."</p> <p>Any such review of development opportunities in the area, where they are within 800m of Crawley Sewage Works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and</p>	<p>Support for removing safeguarding noted.</p> <p>The council does not consider the government's draft Aviation Strategy, Aviation 2050, provides a definitive steer as to whether or not the council will be required to safeguard land for a southern runway at Gatwick Airport moving forward. There is a significant need for Strategic Employment Land in Crawley over the Plan period to 2035, which cannot be met within the borough boundary if safeguarding remains in place.</p> <p>Therefore, the Local Plan makes a commitment to assess, through an Area Action Plan (AAP), how land that has been subject to safeguarding can most appropriately be planned for. Therefore, Regulation 19 Local Plan does not retain the safeguarded land designation. It instead designates an AAP. This will enable the potential growth and operational needs of the airport to be properly considered, alongside significant other development needs in Crawley, including employment and housing opportunities; infrastructure needs including a</p>

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			<p>potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works.</p> <p>Paragraph 170 of the NPPF, February 2019, sets out that: "Planning policies and decisions should contribute to and enhance the natural and local environment by: ...e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans..."</p> <p>Paragraph 180 goes on to state: "Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development...."</p> <p>The odour impact study would establish whether new resident's amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: "When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided."</p> <p><b>If the Local Plan does continue to safeguard land, should the boundary proposed for Option 3 in Gatwick Airport's draft Master Plan be used as the boundary of the safeguarded area?</b></p>	<p>western link road, sustainable transport, and education; environmental, landscape and heritage assets to be protected. The implications of the presence of the Crawley Sewage Treatment Works will be considered as part of this work. Should the evidence demonstrate that part or all of the area previously safeguarded could be used for other purposes, the AAP will fully assess the economic growth potential of the borough in a less constrained scenario. The most appropriate, sustainable locations for development and infrastructure with the AAP area will be assessed and identified as part of the AAP. Prior to the adoption of the AAP, only minor extensions to existing buildings will be permitted in the previously safeguarded area.</p>

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			We do not agree that the Local Plan should continue to safeguard the land as there is no justification for this. However, if it does, Crawley Sewage Works should be removed from the safeguarding.	
REP22/061	Thames Water	H2	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites, but more detailed modelling may be required to refine the requirements. Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> <li>• What drainage requirements are required on and off site</li> <li>• Clarity on what loading/flow from the development is anticipated</li> </ul> <p>It should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build. (*attached site spreadsheet*)</p>	<p>Comments and information noted. The current Housing Trajectory shows levels of anticipated developments and timescales for this to be brought forward. However, this only applies to development within Crawley, and needs to be considered against impact from potential wider strategic proposals (west of Crawley etc.). Amendments have been made to the supporting text to Policy IN1 to reflect the comments made.</p>
REP22/060	Thames Water	Policy EP1	<p>The National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is</p>	<p>Noted. Draft Policy EP1 has been prepared to reflect national policy requirements as set out in the NPPF and Planning Practice Guidance: Flood Risk and Coastal Change.</p> <p>Noted. Water and/or Sewerage infrastructure is identified by PPG: Flood Risk and Coastal Change (Table 2) as Essential Infrastructure which has to be located in a flood risk area for</p>

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			<p>likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p> <p>Flood risk sustainability objectives should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change.</p> <p>SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits.</p> <p>With regard to surface water drainage, Thames Water request that the following paragraph should be included in the Neighbourhood Plan: <b><i>"It is the responsibility of a developer to make proper provision for surface water drainage to ground, water courses or surface water sewer. It must not be allowed to drain to the foul sewer, as this is the major contributor to sewer flooding."</i></b></p>	<p>operational reasons. The draft policy reflects this guidance.</p> <p>Noted. The policy has been worded so as to refer to floor risk from all sources, including fluvial, pluvial (surface water) and sewer flooding. There is specific acknowledgement in relation to flooding from surface water and sewer overload at paragraph 15.12 of the supporting text.</p> <p>Noted. Part iii of draft Policy EC1 requires development to reduce peak surface water run-off rates and annual volumes of run-off through the effective implementation, use and maintenance of SuDs (subject to technical feasibility or viability)</p> <p>Noted. This is consistent with the recommendations of the Water Cycle Study, and wording has been added to Policy EC1 to reflect this comment.</p>
REP155/498	West Sussex County Council		<p><b>Introduction</b></p> <p>This note sets out West Sussex County Council's (WSCC) officer level response to the consultation on the Crawley Local Plan Review: Reg 18</p>	Responses provided on specific comments in later sections.

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			<p>Consultation and the Draft Infrastructure Plan. It highlights key issues and suggested changes to which Crawley Borough Council (CBC) is requested to give consideration. We will continue to work with CBC in the preparation of the Local Plan Review and the Infrastructure Delivery Plan regarding WSCC service requirements in order to mitigate planned development.</p>	
REP155/499	West Sussex County Council		<p><b>Minerals and Waste (Planning)</b>  A steady and adequate supply of minerals and the achievement of sustainable waste management can help to achieve a District or Borough Council's goals in relation to the economy, housing, transport, communications, strategic infrastructure and the environment. Therefore, District and Borough Local Plans should recognise the importance of minerals and waste issues as relevant to the scope of their overall strategies.  Please consider the location of sites in relation to minerals and waste sites and safeguarded uses. Consideration should be given to the Joint Minerals Local Plan, particularly Policy M9 (and associated guidance) on mineral safeguarding.  Policy M9 of the West Sussex Joint Minerals Local Plan (2018) requires the safeguarding of existing minerals sites from non-mineral development, it also safeguards soft sand (including potential silica sand), sharp sand and gravel, brick-making clay, building stone resources and chalk reserves against sterilisation. The policy sets out proposals for non-mineral development within the Minerals Safeguarded Areas will not be permitted unless they meet the criteria set out. The implementation of M9 requires cooperation between West Sussex County Council and the local planning authorities. Applications for any development in a minerals safeguarding area should be the subject of consultation with West Sussex County Council.  The West Sussex Waste Local Plan, 2014 (WLP) sets out the vision and strategic objectives for waste planning. Policy W10 of the WLP allocates sites to meet the identified shortfalls in transfers, recycling and recovery capacity set out in Policy W1 (Need for Waste Management). Policy W2 (Safeguarding Waste Management Sites and Infrastructure) seeks to safeguard existing waste sites and infrastructure for the achievement of sustainable waste management. A list of safeguarded</p>	<p>Noted. Local Plan paragraph 9.46 outlines that the existing minerals site (the railhead and associated storage and handling facilities) at Crawley Goods Yard is safeguarded from other forms of development. Crawley Goods Yard, including its 250 metre buffer, is shown on the Local Plan Map, with a cross reference to the West Sussex Minerals Local Plan 2018.</p>

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			waste sites is listed in the West Sussex Monitoring Report 2017/18 ( <a href="http://www.westsussex.gov.uk/mwdf">www.westsussex.gov.uk/mwdf</a> ).	
REP155/500	West Sussex County Council	Para. 4.32	<b>WSSC Highways</b> To help with clarity there are a number of suggested amendments to paragraphs and policies: <b>Paragraph 4.32 criterion 1 (Transport – Rail):</b> To aid clarity, it is suggested that criterion 1 is amended to read – <b>Two of the best rail stations south of London, in terms of connectivity:</b> <ul style="list-style-type: none"> <li>• <i>frequency of services,</i></li> <li>• <i>journey times / express services;</i></li> <li>• <i>number, variety and desirability of destinations served being Gatwick Airport and Three Bridges;</i></li> </ul>	Agreed: amendment made.
REP155/501	West Sussex County Council	Policy CD9	<b>WSSC Highways: CD9 Crossovers</b> There is concern that any 'vehicle crossovers' could result in a loss of public on street parking as it will effectively create private parking spaces.	Comment noted. The policy seeks to cover this concern.
REP155/520	West Sussex County Council	Policy LC6	<b>Countryside</b> WSSC own the Buchan Country Park which although in Horsham DC area is located in south east part of the CBC, bordering land to south of Broadfield in the High Weald AONB. Buchan Country Park is also referred to in the plan as the Country Park. Specific comments are as follows: <b>Policy LC6 High Weald Area of Outstanding Natural Beauty:</b> Buchan Country Park is within the High Weald AONB and WSSC support the policy to include key requirements from the High Weald Management Plan.	Support for inclusion of key requirements from the High Weald Management Plan is noted. Reference is made to the need to have regard to the Management Plan in the policy. More detail has now been provided in the supporting text to this policy drawn from the Management Plan and advice from the AONB Unit.
REP155/517	West Sussex County Council	Policy OS3	<b>WSSC Highways</b> <b>Policy OS3 – Rights of Way and Access to the Countryside:</b> it is welcomed that PROWs will be protected and enhanced where appropriate; however, this is stated as only where PROWs are not considered unnecessary or not-needed within a development site. The policy should be extended to enhance PROWs whenever part of a development proposal – laying improved, year-round useable surfaces or extending rights to cyclists (and horse riders where appropriate) will be of great value to achieve the plans Vision.	Policy OS2 encourages provision of new public rights of way, and OS3 seeks to protect and enhance routes, to multi-functional routes. The further suggestions will be beneficial for the emerging Crawley draft Transport Strategy.

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			<p>CBC may wish to consider improvements or aspirations for sustainable travel in the wider area, such as:</p> <ul style="list-style-type: none"> <li>i. establishing a 'Green Circle' for walking and cycling around the borough with routes linking the centre;</li> <li>ii. developing links to surrounding areas, e.g. Kilnwood Vale, Buchan Country Park, the new Pease Pottage strategic site, Copthorne, Charlwood, Ifieldwood;</li> <li>iii. requiring all future footways/ footpaths to be provided for use by walkers and cyclists as a minimum. Routes that can reasonably be used by horse riders too should be provided as new public bridleways;</li> <li>iv. paths designed and delivered for use by all ages and abilities.</li> </ul>	
REP155/521	West Sussex County Council	Policy OS3	<p><b>Countryside</b> WSSC own the Buchan Country Park which although in Horsham DC area is located in south east part of the CBC, bordering land to south of Broadfield in the High Weald AONB. Buchan Country Park is also referred to in the plan as the Country Park. Specific comments are as follows: <b>Policy OS3 Rights of Way and Access to the Countryside:</b> the policy is clear and justified and reflects the aims of the West Sussex Rights of Way Improvement Plan.</p>	Comments and Support for Policy OS3 noted.
REP155/502	West Sussex County Council	Policy IN1	<p><b>WSSC Highways</b> <b>IN1: Infrastructure Provision: First paragraph</b> This text should be strengthened by amending 'and if mitigation can be provided' to '<b>and where mitigation is to be provided</b>'. This will require the applicant to commit to a deliverable and funded strategy to provide the mitigation, rather than merely to demonstrate that such mitigation would be possible.</p>	This section of policy text has been reworked, and it is considered that the amended text incorporates the sense of this suggestion.
REP155/518	West Sussex County Council		<p><b>Education</b> The numbers of new developments proposed, in addition to the adopted Local Plan (approx. 420) will equate to about 15 additional places per year of age. While these might be provided in the existing schools, it will ultimately depend on the housing mix. It is likely that an additional ½ FE is required at all secondary and primary schools. WSSC will continue to work with CBC to ensure that the correct provision is identified to be</p>	Noted. CBC will continue to liaise with WSSC.

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			provided to mitigate planned development as the Plan develops to be identified in policy and/or the Infrastructure Delivery Plan.	
REP155/523	West Sussex County Council	Policy IN3	<p><b>Digital Infrastructure</b>  <b>Policy IN3 supporting high quality communications:</b> WSCC supports the NPPF section 10 paragraphs 112 – 116 which outline the approach to be taken through planning policy and decisions in planning in regard to supporting high quality communications and the siting of telecommunications infrastructure. This is also supported by the 'Code of best practice on mobile network development in England' published by DCLG.</p> <p>WSCC strongly support that planning authorities hold policies that prioritise how, in making planning deliberations, they ensure developers make provision for gigabit-capable full fibre network and welcomes Policy IN3 in ensuring new development is full-fibre ready.</p> <p>Policy IN3 refers to incorporating fibre optic cables directly into development, however it is requested that <b>reference is made to 'gigabit-capable full fibre infrastructure'</b> in order to provide future-proofed broadband services and to support the delivery of future technologies.</p>	Policy IN3 has been amended in accordance with WSCC advice.
REP155/524	West Sussex County Council		<p><b>Fire and Rescue Services</b>  Any increase in population, particularly over 65, will increase pressure on the service, as will any increase in commercial floorspace. WSCC would like to work with CBC following the Reg. 18 consultation to identify mitigation requirements from planned development to be reflected in policy and/or the Infrastructure Delivery Plan.</p>	This seems to concern cumulative pressures rather than individual site-specific mitigations, so we would anticipate this to be via CIL. There remains scope to seek fire hydrants on site, including through S106.
REP207/918	West Sussex County Council Digital Infrastructure Team	Policy IN3 and Paras. 8.15 – 8.22	<p>I can answer the consultation questions on behalf of WSCC's Digital Infrastructure Team:</p> <ol style="list-style-type: none"> <li>1) Yes, I agree that the policy is justified and necessary.</li> <li>2) I would suggest not including further detail regarding the specification and standards of cabling as the technology is moving at pace and there is a danger that detailing specifications now will inhibit developers incorporating the latest technology in the future.</li> <li>3) No further clarification needed as the policy details all residential, employment and commercial development.</li> <li>4) Yes, reference is made to gigabit-capable full fibre broadband.</li> </ol>	<p>Support noted.</p> <p>The suggested amendments have been incorporated into the draft Plan Policy.</p>

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			<p>5) We mooted creating a best practice guidance document along the lines of the WSCC Environmental guidance. I'll ask Caroline West about the process for getting one drafted and how the Environment document was introduced and used with colleagues in planning authorities.</p> <p><i>*Attached Policy with suggested track changes*</i></p>	
REP155/503	West Sussex County Council	Policy EC1	<p><b>WSCC Highways</b> <b>EC1: Sustainable Economic Growth</b></p> <p>The policy refers to between 44.6 and 57.63 hectares of additional land for business use, on top of 13.19 hectares already identified - assumed to mean already allocated or consented - whilst the supporting text refers to 35 hectares unmet need. At present, although there is a hierarchy of land proposed, it is not yet clear what new employment land will be delivered in the borough over the plan period, what the plot ratio will be – floorspace per site area - nor what the mix is likely to be between different employment uses which have greatly differing density of square metres of floor area per job and proportions of traditional working times versus shift working.</p> <p>The provision of 44.6 hectares of additional employment space could lead to an increased demand for car travel in the morning peak hour (8-9am) of between approximately 600 and 6000 vehicle trips, depending on these considerations, based on comparison to existing trip generation patterns for towns in Great Britain, excluding Greater London obtained from the TRICS database. This leads to the need for a full transport study to examine potential locations, site density and employment mix and how travel demand should be managed.</p>	<p>Noted. The initial figures referred to in the Regulation 18 Local Plan have been subject to further work through the Economic Growth Assessment. The Regulation 19 Local Plan is therefore planning for a business land requirement of 33 hectares, which taking account of the current 12 hectares land supply pipeline, results in an outstanding business land requirement of 21 hectares over the Plan period. Based on the council's uncapped housing requirement, there is a potential need for higher growth of 113 hectares business land. The scope to accommodate this within Crawley's administrative area will be assessed in full through the Area Action Plan. Transport modelling will be updated in partnership with WSCC to commence based on the planned figure of 33 hectares business land growth, and will be updated through the Area Action Plan process.</p>
REP155/504	West Sussex County Council	Policy EC3	<p><b>WSCC Highways</b> <b>EC3: Office Provision</b></p> <p>Identified need is stated at 169,020 office floorspace, although it is not stated whether this figure is for GIA or external floorspace. Reference to the TRICS database indicates that that this level of GIA floorspace in B1(a) use could lead to 2160 additional motor vehicle trips in the AM peak hour, but this would be associated with a far greater level of uplift in jobs than that suggested in paragraph 9.35 of the supporting text of 2800 jobs. Reference to employment density guidance from the HCA suggests that for this level of jobs to be associated with 169,020 square</p>	<p>Noted. As set out above, the Local Plan business land requirement, as informed by the Economic Growth Assessment, has now been updated. Based on the 33 hectare growth figure, a total need is identified for 27,200sqm new office floorspace. The EGA provides further detail on the Northern West Sussex office market, finding that the challenge for Crawley is not one of quantitative office supply, but qualitative, with a lack of Grade A office</p>

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			metres GIA, the employment would need to be at the lowest density of B1(b) research and development. A 50% B1(a) office/50% B1(b) mix would be associated with 5450 jobs at this floorspace leading to 1050 AM peak trips. If floorspace is to be provided for 2800 additional jobs, this would be associated with around 500 AM peak hour trips. This analysis is broad brush and intended to illustrate the need for a transport study to consider this provision and its spatial strategy in more detail.	space supressing the Crawley office market. The Regulation 19 policy therefore seeks to address the qualitative office supply issue. The updated office figure will be factored into the transport modelling to inform the Local Plan. Any possible increase beyond this figure, as part of a Baseline Labour Supply scenario, would form part of the transport modelling to inform the Area Action Plan.
REP155/506	West Sussex County Council	Para. 10.4	<b>WSSC Highways Gatwick Airport</b> <b>Paragraph 10.4:</b> rather than the draft Gatwick Airport Master Plan (October 2018), it is pertinent to refer to the final Gatwick Airport Final Master Plan 2019 and figures in this report.	Noted. Text to be updated to refer to the Gatwick Airport Master Plan 2019.
REP155/507	West Sussex County Council	Para. 10.6	<b>WSSC Highways</b> <b>Paragraph 10.6:</b> Development Consent Order: it is suggested that CBC consider inserting a paragraph on the current status of the DCO and proposed DCO timescales.	The most up to date position on the DCO process has been added at para 10.13.
REP155/508	West Sussex County Council	Para. 10.9	<b>WSSC Highways</b> <b>Paragraph 10.9:</b> Under the main evidence based documents reference is made to Draft Gatwick Airport Master Plan (Gatwick Airport Limited, October 2018). This should be amended to refer to ' <b>Gatwick Airport Final Master Plan (Gatwick Airport Limited, 2019)</b> '	Noted. Evidence base documents list has been updated to reflect publication of Gatwick Airport Master Plan 2019.
REP155/509	West Sussex County Council	Para. 10.11	<b>WSSC Highways</b> <b>Paragraph 10.11:</b> the last sentence should be amended to read: '...additional runway to the south of the airport which could increase capacity to around 95mppa within 20 or 25 years <b>from opening the additional runway</b> '	Noted and text amended.
REP155/505	West Sussex County Council	Policies H1 & H2	<b>WSSC Highways</b> <b>H1: Housing provision and H2: Key housing sites</b> It is unclear at present how much of the net housing provision will be over and above the sites already allocated and considered in the previous transport assessment. Reference to H2 Key Housing Sites does make it clear that the contribution of existing sites is significant. Transport study work is required to consider this further and to ensure that the transport package provided will continue to support the network	The transport study work is to be undertaken with WSSC as a lead partner in commissioning. This will set out the additional sites beyond those already included in the reference case (and above those already allocated in the adopted Local Plan). The Local Plan at the point of submission will reflect the outcomes of this study.

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			performance until the end of plan year of 2036, including identification of any further transport mitigation schemes or amendments to design of those transport schemes associated with the adopted Local Plan yet to be delivered.	
REP155/510	West Sussex County Council	Policy H3g	<b>WSCC Highways H3g: Urban Extensions</b> Transport study work is currently underway in the neighbouring district of Horsham and there is potential for a joint approach to consider this issue further.	On-going joint working, through the Duty to Cooperate and across administrative boundaries, is welcomed. It is anticipated that the transport study work in the neighbouring authorities will form part of transport modelling and will be reflected in the final draft Policy.
REP155/522	West Sussex County Council	Policy H8	<b>Countryside</b> WSCC own the Buchan Country Park which although in Horsham DC area is located in south east part of the CBC, bordering land to south of Broadfield in the High Weald AONB. Buchan Country Park is also referred to in the plan as the Country Park. Specific comments are as follows: <b>Policy H8 Gypsy, Traveller and Travelling Showpeople Sites:</b> WSCC welcome the stated aim in reasoned justification 12.110 that 'The council will continue to search for and analyse the potential for alternative sites as factors change over the Local Plan period'. WSCC regard the current location of the potential settlement to not meet the set assessment criteria, as it is located within the High Weald AONB and outside the current Built-Up Area Boundary but have previously accepted its inclusion after discussion with CBC providing appropriate mitigation stated is included in any planning application.	Acceptance of allocated site noted.
REP155/519	West Sussex County Council	Para. 15.18	<b>Lead Local Flood Authority</b> With regard to flooding there are no additional comments on the proposed allocated sites. Support is given to paragraph 15.18.	Noted and support welcomed.
REP155/511	West Sussex County Council	Para. 16.1	<b>WSCC Highways – Sustainable Transport Paragraph 16.1</b> “The retention of existing essential transport infrastructure”; it is suggested that the word 'essential' is removed from this statement.	Agreed. Amendment made.
REP155/512	West Sussex County Council	Policy ST1	<b>WSCC Highways – Strategic Policy ST1: Development and Requirements for Sustainable Transport</b> - Amendments to the policy are suggested as follows: iii. For development which generates a significant demand for travel, and/or is likely to have other transport implications: contributing to	Policy amended to this effect.  Amendments made.

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>improved sustainable transport infrastructure, including, <b>where appropriate, bus priority measures, enhanced passenger information and / or</b> routes identified in the council's Local Cycling and Walking Infrastructure Plan;</p> <p>a) Transport Statement, which assesses the impact of a development with relatively small transport implications and <b>a Travel Plan Statement</b>, which identifies how the development will maximise the usage of sustainable modes of transport as opposed to the private motor vehicle; or a</p> <p>b) Transport Assessment, which assesses the impact of a development when there are significant transport implications, <b>and a Mobility Strategy (for large developments) or</b> Travel Plan, which identifies how the development will optimise the usage of sustainable modes of transport as opposed to the private motor vehicle. <b>The Mobility strategy or Travel Plan will identify appropriate improvements to sustainable modes, or the introduction of new infrastructure that are required to adequately mitigate development impacts and detail how these will be delivered and operated.</b></p>	
REP155/513	West Sussex County Council	Policy ST2	<p><b>WSCC Highways Strategic Policy ST2: Car and Cycle Parking Standards</b></p> <p>It is suggested that the final paragraph is amended to read: Provision of new car parking spaces should include a proportion of spaces with electrical charging facilities installed and operational, in accordance with the most recently published West Sussex County Council Guidance on Parking at New Developments <b>and its emerging EV Strategy.</b></p>	Para 16.15 amended to include this reference.
REP155/514	West Sussex County Council	Para. 16.14	<p><b>WSCC Highways Paragraph 16.14 - Rail Stations:</b></p> <p>It is suggested that some form of supporting text reference the potential development of new stations that may be located near the boundary (Kilnwood Vale) of CBC but may have a major role to play in sustainable travel of existing residents and potential new developments. The text may indicate how the council will support neighbouring authorities in delivering appropriately located new rail stations.</p>	Noted. Policy H3g Urban Extensions encourages sustainable transport and the delivery of infrastructure to support development beyond the borough boundary.

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
REP155/515	West Sussex County Council	Policy ST4	<p><b>WSCC Highways</b>  <b>Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Relief Road</b></p> <p>It is requested that the final paragraph is amended to read:  The design and route of the Western Relief Road must take account of its impact on residential properties close to the route, <b>provision of suitable bus priority measures (including future proofing for forecast traffic growth and congestion), future proofing for technological developments in transport provision</b>, the flood plain, the rural landscape, local biodiversity, heritage and heritage landscape assets and visual intrusion.</p>	Noted. Policy amended to better reflect this advice.
REP155/516	West Sussex County Council		<p><b>WSCC Highways</b>  <b>Highways – Public Rights of Way (PROW)</b></p> <p>PROWs are mentioned but not significantly. It is suggested that they are recognised as a valuable access resource separately and additionally to the road highway network. PROWs minimises local vehicle journeys, thereby reducing road congestion and enhancing air quality; they are a means for activity for health and wellbeing; they support local community integration/ interaction, so combatting isolation and loneliness; and give good reason to establish wildlife corridors, so aiding the local environment. Given all those positive benefits, PROWs will be a valuable means to meet the ambitions set out in the Local Plan Vision and add to residents' quality of life as part of new housing developments, and so it is suggested should be recognised further in the plan.</p> <p>Ensuring the availability of the PROW network and enhancing it will deliver a number of the Plan's policy ambitions:</p> <ul style="list-style-type: none"> <li>i. SD1 – Sustainable Development and a target of being carbon neutral;</li> <li>ii. SD2 – Enabling Healthy Lifestyles and Wellbeing;</li> <li>iii. CD4(a) – Effective Use of Land;</li> <li>iv. OS2 – Provision of Open Space and Recreational Facilities;</li> <li>v. IN2 – Location and Provision of New Infrastructure;</li> <li>vi. EC12 – Rural Economy (in that businesses support local cyclists and horse riders with goods and services, also walkers through tea rooms, etc.);</li> </ul>	Noted. Policy OS3 is a specific policy for Rights of Way and Access to the Countryside. Policy ST1 (Development and Requirements for Sustainable Transport) also emphasises the importance of developments' linkages to the importance of the walking and cycling network and provides a basis for securing contributions to support routes identified on the Local Cycling and Walking Infrastructure Plan.

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<ul style="list-style-type: none"> <li>vii. H3c – Open Spaces within new housing developments;</li> <li>viii. G11 – Green Infrastructure;</li> <li>ix. ST1 – Development and Requirements for Sustainable Transport (it is welcomed to prioritise need of non-motorised users over private motorised users).</li> </ul>	
REP155/525	West Sussex County Council	Page 30	<p><b>Transport – Rail (page 30) Current Findings - 5<sup>th</sup> bullet point:</b> The Network Rail Croydon Area Remodelling Scheme (CARS), which includes improvements to junctions in the 'Selhurst Triangle' – this includes Windmill Bridge Junction - north of East Croydon station, along with two additional platforms at East Croydon station is key to capacity improvements on the Brighton Main Line which will allow for increased services along with greater reliability and faster recovery of service from incidents of disruption. This major project has been consulted upon in Autumn 2018 for a Transport and Works Act Order, but is currently funded for the design stage including a further consultation on design in 2020, with funding for construction remaining to be confirmed.</p>	This has been included.
REP155/526	West Sussex County Council	Page 32	<p><b>Transport – Road (page 32) Evidence base:</b> A number of the documents listed in the evidence base, notably including the Transport Assessment documents which are specific to the Local Plan are now ageing. There were also weaknesses in the model accuracy for representing the PM peak, which were accepted at the time for reasons of resources but should not be carried forward to the new plan. Whilst the transport modelling for the Crawley Sustainable Transport Package is more recent, being based on a 2015 base year with forecasting years of 2030 and 2045, this is still considering infrastructure schemes based on adopted Local Plan assumptions along with updated consents and does not consider continued Local Plan allocations to the new end of Local Plan year of 2036. There is therefore a need to renew the transport evidence base to inform Reg 19 consultation, submission and examination.</p> <p><b>Current Findings – 2<sup>nd</sup> bullet:</b> This requires re-wording for improved clarity, as whilst these junctions were not over capacity due to background growth, the reason for requiring mitigation is that the travel demand resulting from adopted Local Plan development is forecast to push them over capacity.</p>	<p>Transport Modelling is to be updated to inform the Plan.</p> <p>Change made.</p>

Representor/ Representation Reference	Name/ Organisation	Policy/ Para/ Page No.	Comments	CBC Response
			<p>It is suggested that it is rewritten to read <b>“Transport Assessment identified a number of junctions that perform significantly worse as a result of development proposed in the Local Plan, although not already over capacity from background growth and would require mitigation to return them to capacity.”</b></p> <p>In addition, the signalisation of Bewbush Manor Roundabout is not mentioned in this section.</p> <p><b>Future Studies and Plans:</b> This point is supported by WSCC, for the reasons stated in the comments on the existing evidence base. Prior to forecasting for the Local Plan period to 2036, there is a need to update the base year transport model from 2015 to ensure that that the model base year validation remains less than five years prior to when the evidence is considered at examination. The County Council is happy to discuss the methodology and likely timescale for this with the Borough Council in more detail within officer level meetings. The transport study should prioritise transport solutions increasing the use of sustainable modes including public transport, walking and cycling ahead of further improvements to highway capacity within the urban area of Crawley, whilst residual capacity improvements should not be precluded to resolve identified severe impacts, when other measures alone cannot achieve sufficient mitigation to meet the NPPF policy test.</p>	<p>We understand that this is required to support Kilnwood Vale rather than development within Crawley.</p> <p>Comments noted.</p>
REP155/527	West Sussex County Council	Page 34	<p><b>Transport – Walking and Cycling (page 34) Future Studies and Plans:</b> this currently reads “Crawley Borough Council is currently developing an LCWIP (Local Cycling and Walking Infrastructure Plan). This will identify future around 10 or so routes or further development following a 6-step process prescribed by the Department for Transport (and will include cost estimates).”</p> <p>Should this read, “Crawley Borough Council is currently developing an LCWIP (Local Cycling and Walking Infrastructure Plan). This will identify approximately 10 routes for further development following a 6-step process prescribed by the Department for Transport”?</p>	Change made.
REP155/528	West Sussex County Council	Page 35	<p><b>Transport – Bus (page 35):</b> improvements are needed at Broadfield bus stopping area at Broadfield shops; the current stopping area does not have the capacity to accommodate the number of buses that use this area.</p>	Change made.

## ii. Publication Consultation (20 January – 2 March 2020)

Ref. No.	Respondent	Policy/ Para	Comments																				
REP/019	Arun District Council	Duty to Co-Operate	<p>Arun District Council's response is in the form of a Report to the Planning Policy Sub-Committee which met on 25 February and agreed the recommendations of the report - which is attached. This response does not make an objection to the Local Plan under the Duty to Cooperate but that this position is conditional on the recommendations of the Council's response set out in the report, being addressed satisfactorily.</p> <p>The Crawley Reg 19 Publication Local Plan (CLP) is being consulted on for soundness. The consultation closes on 2 March 2020. The CLP is housing supply 'constrained' and consequently only sets out provision as follows:-</p> <table border="1"> <thead> <tr> <th>Plan period</th> <th>2020-25</th> <th>2025-30</th> <th>2030-35</th> <th>2020-2035</th> </tr> </thead> <tbody> <tr> <td>Housing Provision</td> <td>+2,500</td> <td>+2,250</td> <td>+605</td> <td>+5,335</td> </tr> <tr> <td>OAN Requirement</td> <td></td> <td></td> <td></td> <td>11,280</td> </tr> <tr> <td>Shortfall</td> <td></td> <td></td> <td></td> <td>-5,945</td> </tr> </tbody> </table> <p>The planned housing provision of 11,280 dwellings over 15 years 2020-2035 will mean that there is a residual shortfall of -5,945 dwellings compared to the OAN requirement based on the Governments' Standard Housing Methodology (SHM).</p> <p>The CLP suggests that the residual unmet need should be accommodated in neighbouring authorities falling within the North West Sussex Housing Market Area (NWSHMA), specifically Horsham and Mid Sussex, through the Duty to Cooperate by negotiating provision in respective local plans (e.g. the potential for urban extensions around Crawley). It is also acknowledged that the Government's SHM has increased housing figures for these authorities so that this is now also becoming more difficult:</p> <p><i>"...Currently, the adopted Local Plans for Horsham and Mid Sussex districts are anticipated to provide an additional 3,150 dwellings, above their objectively assessed housing needs, in order to meet Crawley's unmet need. However, through the Local Plan Reviews this figure is likely to change, particularly as the Standard Method increases their own housing requirements to above their current adopted Plan commitments (see paragraph 2.28)"</i></p> <p>In context, the issue of an existing level of unmet housing need identified across the West Sussex and Greater Brighton Area, adds to the urgency to achieve progress on the update to the Local Strategic Statement (i.e. LSS3). This progress is needed to inform the 'Duty to Cooperate'. For example, on 27 January 2020 Elmbridge Borough Council (in Surrey) wrote to Arun District Council (ADC) and other authorities seeking assistance with unmet housing need (of circa 4,000 dwellings), under the 'Duty to Cooperate'.</p> <p>While ADC is remote from and does not have direct cross boundary/strategic issues with Crawley Borough (or indeed Elmbridge Borough), until Crawley's unmet need is resolved by neighbouring districts, there may be consequent implications for the Arun local planning authority area.</p> <p>Currently – there appears to be no up to date evidence on Crawley Borough's web site in support of the CLP with regard to the 'Duty to Cooperate' and 'Statements of Common Ground' or 'Memoranda of Understanding', addressing how unmet need is to be accommodated through adjacent local plans or via the LSS3 process.</p> <p>It is understood that Horsham District's draft Local Plan (2019-2036) will undergo a Regulation 18 consultation 17 February – 30 March. Amongst other options, that draft Local Plan will include a potential urban extension of circa 10,000 dwellings on a site at Ifield adjacent to Crawley urban area. This would offer a significant potential contribution towards Crawley's unmet housing need. Crawley Borough Council is therefore, urged to set out in Statements of Common Ground with neighbouring authorities within its Housing Market Area, how its unmet need is to be resolved before the plan is submitted for examination.</p>	Plan period	2020-25	2025-30	2030-35	2020-2035	Housing Provision	+2,500	+2,250	+605	+5,335	OAN Requirement				11,280	Shortfall				-5,945
Plan period	2020-25	2025-30	2030-35	2020-2035																			
Housing Provision	+2,500	+2,250	+605	+5,335																			
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Ref. No.	Respondent	Policy/ Para	Comments
			<p>It must be stressed that Crawley Borough Council has not asked ADC to assist with any unmet housing need given the CLP seeks assistance from Horsham and Mid Sussex and other authorities within the NWSHMA. However, given the wider unmet need outlined above, and risks should there be insufficient progress on LSS3, ADC should seek a specific Statement of Common Ground with Crawley Borough consolidating this position.</p> <p><b>Suggested Modifications:</b>  Before the plan is submitted, there needs to be up to date evidence via signed Statements of Common Ground with neighbouring authorities within the North West Sussex Housing Market Area (WSHMA) on how any residual unmet housing need is to be accommodated. Similarly, a Statement of Common Ground needs to be agreed with Arun District Council given that there is a formal request from Crawley Borough Council for authorities outside of the WSHMA to consider whether assistance can be provided on a level of unmet housing need.  That Planning Policy Sub Committee agrees that:-  1) In response to the Crawley Local Plan Regulation 19 consultation, Crawley Borough Council is urged to clearly set out in updated Statements of Common Ground with neighbouring authorities within its Housing Market Area, how its unmet need is to be resolved before the plan is submitted for examination; and  In the absence of progress on the LSS3 update, a Statement of Common Ground is agreed specifically with Arun District Council to clarify that no assistance will be required in order to help with the level of unmet need arising from the Borough.</p>
REP/ 039	Crawley CCG	IN1	<p>Crawley Clinical Commissioning Group (CCG)  The CCG is mindful of the minimum projected new housing numbers to 2035 being 5355. This will relate to a potential increase of 13,387 new residents/patients across the borough.  Crawley Borough Council will already be aware that current and recent past new house and flat building spanning the past 4 years has created significant pressure on a number of Crawley's GP practices delivering Primary Care NHS services.  In relation to this, in the absence of Section 106, the CCG has made a Community Infrastructure Levy (CIL) bid to the council for NHS capital infrastructure improvements so that Pound Hill Medical Group and Saxonbrook, Northgate Surgery could carry out internal redesign projects to enable these practices to be able to accommodate more patients as a result of new areas of building in the town within their catchment areas.  However, whilst these bids were approved in cabinet there has apparently been insufficient CIL monies which the council has had to satisfy the above bids which were relatively modest in size.</p> <p><b>Suggested Modifications:</b>  Given the minimum increase in new building forecast by Crawley Borough Council to 2035, the CCG would like Primary Health care elevated so that as far as CIL distribution is concerned, it becomes a priority sector as other local authorities have done E.G. Reigate &amp; Banstead Borough Council, Tandridge District Council and recently, Horsham District Council where CIL has been fully adopted.  The importance of this cannot be stressed enough as there are limited allocations of NHS capital funding available This will enable those GP practices operating from older premises to be able to benefit from infrastructure funding for capital improvements where there are new housing developments within their own catchment areas. This will then be an advantage to the residents of Crawley and will take some of the pressures away to enable new patients to be taken on.</p>

Ref. No.	Respondent	Policy/ Para	Comments
REP/ 012	Department of Education	IN1	<p>DfE supports the reference to developer contributions being sought for education schemes. However, it is noted that a number of housing delivery policies include intensification, infill, extensions and changes of use, which are more likely to cumulatively generate the need for school places, but are unlikely to justify the need for new built physical education infrastructure on site in isolation. Therefore, DfE would recommend that policy IN1 clarifies that where development generates the need for new school places, developer contributions will be sought.</p> <p>DfE notes that the draft Local Plan anticipates an annual housing target of 451 dwellings per year until 2024/25 and then 255 dwellings per year until the end of the plan period in 2035. This will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.</p> <p>Please note that there are two routes available for establishing a new school. Firstly, a local authority may seek proposals from new school proposers (academy trusts) to establish a free school, after which the Regional Schools Commissioner will select the successful trust. Under this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and managing the build process. Secondly, school proposers can apply directly to DfE during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or provide a site. Either of these routes can be used to deliver schools on land that has been provided as a developer contribution. DfE has published further general information on opening free schools<sup>1</sup> as well as specifically in relation to opening free schools in garden communities.<sup>2</sup></p> <p>DfE welcomes reference within the plan's vision to the role of education provision in creating stronger communities. Paragraph 1.20 refers to collaboration between Crawley Borough Council and other authorities and infrastructure providers to meet forecast demands. You will be aware of two live free school projects in Crawley, being delivered directly by DfE through the 'wave' approval route explained above in paragraph 5, rather than West Sussex County Council. These projects include: • Gatwick Free School – which is open on a site at 23 Gatwick Road and in the process of securing permanent planning permission; and • Forge Wood High School – which does not yet have an identified site.</p> <p>12. Due to these projects, it would be helpful to include DfE in your discussions about infrastructure provision, involving us in the position statements the plan refers to in paragraph 1.21. There should be collaborative working between DfE, Crawley Borough Council and West Sussex County Council on education provision to meet the needs of the borough.</p> <p>Paragraph 2.21 of the draft Local Plan recognises the unusual population profile in Crawley, with around two thirds of the population under the age of 45 and forecast demographic change leading to increased demand for educational facilities. However, there are no proposals in the plan to allocate sites for education, and the draft Infrastructure Delivery Plan (IDP) provides very little detail on school provision to meet demand from anticipated housing growth. The lack of detail on school provision in the current Local Plan is one of the reasons why it has been difficult to successfully progress schemes for new education provision in the Crawley area.</p> <p>For the plan to be effective and positively prepared, the IDP should identify which developments the planned school provision will serve (including cumulative or windfall developments where appropriate), the costs of provision, the predicted timescales in line</p>

<sup>1</sup> <https://www.gov.uk/government/collections/opening-a-free-school>

<sup>2</sup> <https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption>

Ref. No.	Respondent	Policy/ Para	Comments
			<p>with the housing trajectory, and the funding sources for each identified education project. The IDP should be prepared in conjunction with an updated viability assessment to ensure that realistic education costs are factored into any decisions about the amount and type of developer contributions that will be required.</p> <p>15. Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough. This enables an informed judgement about which developments would be able to deliver the range of infrastructure required, including schools, leading to policy requirements that are fair, realistic and evidence-based. In accordance with Planning Practice Guidance, there should be an initial assumption that applicable developments will provide both land and funding for the construction of new schools. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are incorporated at the outset, to inform local decisions about site selection and infrastructure priorities.<sup>3</sup></p> <p>Site allocations (for standalone school sites or schools within housing developments) should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicate this might be necessary.</p> <p>While it is important to provide this clarity and certainty to developers and the communities affected by development, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. DfE therefore recommends the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none"> <li>- specific requirements for developer contributions to increasing capacity of existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that</li> <li>- Requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.</li> </ul> <p>With regard to the consultation questions on key infrastructure priorities and whether any community facilities are missing or need improvement (page 83), DfE recommends that the next version of the Local Plan make reference to the provision of new schools on suitable sites when required, with a key priority that the provision of infrastructure should be in step with housing development, making appropriate use of developer contributions.</p> <p>With regard to the consultation questions for draft Policy IN1 (Infrastructure Provision), asking whether the proposed approach is appropriate, justified and consistent with the Community Infrastructure Levy (CIL) Regulations, DfE advises that the approach is reviewed following the introduction of the revised CIL Regulations on 1st September 2019. The CIL Charging Schedule should be reviewed alongside the Local Plan review, giving consideration to new Planning Practice Guidance on viability, CIL and planning obligations as well as the new CIL Regulations which remove the pooling limitation on planning obligations and allow both CIL and Section 106 funding to be used for the same item of infrastructure. These considerations are fundamental to your assessment of the deliverability of the plan, including the size of any infrastructure funding gap and how developer contributions should be secured. All phases and types of education should be considered, including the need for special educational needs provision, with needs and plans for provision set out in the plan.</p>

<sup>3</sup> PPG on viability and planning obligations: <https://www.gov.uk/government/collections/planning-practice-guidance>

Ref. No.	Respondent	Policy/ Para	Comments
			<p>20. We note the statement in the IDP that provision of schools will form part of the calculation of CIL and additional funding sources will need to be considered. In light of the removal of the Section 106 pooling restriction and increased flexibility in how CIL and Section 106 funds are used, we recommend that the Council revisit this matter and consider using Section 106 planning obligations for the provision of new schools and school expansions in all cases where the development will give rise to a need for new school places and there is insufficient capacity in applicable schools to meet that need. It is important to consider the size of any CIL funding gap and whether there will be sufficient CIL funds available to cover the cost of these school places. If CIL will be insufficient or unavailable at the point of need, it would be preferable to seek developer contributions through a planning obligation, to mitigate the direct impacts of development.</p> <p>One of the tests of soundness is that a Local Plan is 'effective', meaning the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. DfE notes that as set out in Strategic Policy IN1 and in the IDP, the Council will review CIL rates to ensure appropriate rates are levied and the cost of providing school places is secured. DfE welcomes the specific reference within this policy to education contributions being specifically sought through developer contributions for the reasons set out below and also as relevant to Crawley being situated within a two-tier system, and the cross-boundary issues.</p> <p>Local authorities have sometimes experienced challenges in funding schools via Section 106 planning obligations due to limitations on the pooling of developer contributions for the same item or type of infrastructure. However, the revised CIL Regulations remove this constraint, allowing unlimited pooling of developer contributions from planning obligations and the use of both Section 106 funding and CIL for the same item of infrastructure. The advantage of using Section 106 relative to CIL for funding schools is that it is clear and transparent to all stakeholders what value of contribution is being allocated by which development to which schools, thereby increasing certainty that developer contributions will be used to fund the new school places that are needed. DfE supports the use of planning obligations to secure developer contributions for education wherever there is a need to mitigate the direct impacts of development, consistent with Regulation 122 of the CIL Regulations.</p> <p>DfE would be particularly interested in responding to any update to the Infrastructure Delivery Plan/Infrastructure Funding Statement, viability assessment or other evidence relevant to education that may be used to inform revisions to local planning policies or the CIL charging schedule. As such, please continue to engage with DfE and consult us on any relevant future consultations.</p> <p><b>Suggested Modifications:</b></p> <p>The following policy amendments are proposed:  <i>... This will include the seeking of planning obligations towards <b>the provision of school places where the need for places is generated by the new development.</b> Specific Education schemes related to the development....</i></p> <p>3. In addition to this, we request a minor amendment either to this policy or its supporting text, to clarify that developer contributions may be secured retrospectively, when it has been necessary to forward fund infrastructure projects in advance of anticipated housing. In order to comply with this national policy, the Local Plan should safeguard land for the provision of new schools and school expansions where appropriate. When new schools are developed, local authorities should also seek to safeguard land for any future</p>

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			<p>expansion of new schools where demand indicates this might be necessary, in accordance with Planning Practice Guidance and DfE guidance on securing developer contributions for education.<sup>4</sup></p> <p>Crawley Borough Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development<sup>5</sup> (2011) which sets out the government's commitment to support the development of state-funded schools and their delivery through the planning system.</p> <p>In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 24-27)<sup>6</sup>, DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. Please add DfE to your list of relevant organisations with which you engage in preparation of the plan.</p> <p>Where there is significant cross-boundary movement of school pupils between a borough and adjoining areas, DfE recommends that the Council covers this matter and progress in cooperating to address it as part of its Statement of Common Ground.<sup>7</sup> This should be regularly updated during the plan-making process to reflect emerging agreements between participating authorities and the Council's own plan-making progress.</p> <p>As recommended above, construction costs and land requirements should be incorporated in the viability assessment to ensure that any barriers to delivery are identified early, to inform the Council's planning and prioritisation of infrastructure delivery. Government 'basic need' grant for the creation of new school places does not include funding for land acquisition. Therefore, it is particularly important that education land required within large development sites is provided at no cost to the local authority wherever possible, and pooled developer contributions (Section 106 and/or CIL) are secured for the purchase of standalone sites for new schools. We request that you consider carefully the appropriate balance of CIL and Section 106 funding for education, to ensure that new schools and school expansions can be delivered when they are needed, in step with housing development. Our guidance on securing developer contributions for education provides further advice on the types of education need that should be considered, and how to calculate the costs of provision.<sup>8</sup></p>
REP/012	Department of Education	IN2	<p>Policy IN2 considers the provision of new infrastructure. With regards to education, the relevant elements of the policy are that community facilities (including education) may be provided alongside allocated housing sites where there is evident need, suitability in relation to the community needs and compliance with other relevant planning policies.</p> <p>6. It should be noted that the NPPF (paragraph 94) sets out that:  <i>It is important that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.</i></p> <p>7. As such, the policy approach at IN2 must reflect the need for sufficient choice and proactivity in planning for school places, rather than simply relating to existing communities.</p>

<sup>4</sup> <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

<sup>5</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>6</sup> NPPF paragraph 24-27 specifies that this collaborative working should include infrastructure providers.

<sup>7</sup> NPPF paragraph 27; and the PPG on Plan-Making - <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

<sup>8</sup> <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

Ref. No.	Respondent	Policy/ Para	Comments
			<p>8. The policy goes on to state that:  <i>Subject to the requirements above, education facilities may be considered acceptable as an alternative use on sites allocated for uses including housing where the educational need met is demonstrated to outweigh the needs that would have been met by the allocated use(s).</i></p> <p>9. Whilst we welcome the inclusion of specific reference to education provision as requested in DfE's Reg 18 representations, this specific wording is too restrictive and could lead to challenges when delivering much needed school places as part of this policy. Indeed, the IDP notes that there is a need for c.8-10FE of secondary school capacity and no suitable sites have yet been identified. It would therefore be advisable to create a more supportive and proactive policy position in relation to school place planning. When implemented, the policy would require the applicant to demonstrate that the education development would meet needs outweighed by the need for new housing. This comparison exercise is inherently flawed as it is not possible to compare the acuteness of education need versus housing need. In any case, a shortage of school places would be exacerbated further by new housing development that does not include sufficient provision. Without a sufficiently flexible approach to infrastructure delivery, to encourage the location of infrastructure where new housing is located, the plan is not sound.</p> <p>DfE supports the sustainability objectives of draft Policy IN2 (New Infrastructure Provision). As explained above, DfE recommends that sites for schools are allocated in the plan, but in the absence of specific allocations the plan should at least recognise that essential community infrastructure such as schools may be considered an acceptable alternative use to other allocated uses, provided the location is proven to be environmentally sustainable and suitable to meet the needs of the community served. This is important in view of the land availability constraints in the borough and the importance of providing infrastructure for existing and new communities. It would also align with the "great weight" placed on the provision of school places in the NPPF. Making this clear in the plan would simplify the decision-making process when planning applications are considered. DfE requests this clarification in answer to the consultation question on page 85, asking whether the wording needs further clarification in the policy or elsewhere. While there appears to be an intention to roll forward existing allocations from the adopted Local Plan, the Council should consider afresh the need for education facilities and the mechanisms for delivery, taking account of the latest Planning Practice Guidance and DfE guidance on securing developer contributions for education. As noted above, the absence of detail on education provision in the current Local Plan has been an issue for school delivery in the Crawley area.</p> <p>Whether in addition to or in replacement of the IDP, the Council should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement<sup>9</sup>. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure. The statement should be reviewed annually to report on the amount of funding received via developer contributions and how it has been used, providing transparency to all stakeholders.</p> <p>DfE would be particularly interested in responding to any update to the IDP/Infrastructure Funding Statement, viability assessment or other evidence relevant to education which may be used to inform local planning policies and CIL charging schedules. As such, please add DfE to the database for future consultations on relevant plans and proposals.</p> <p><b>Suggested Modifications:</b>  Therefore, we would propose the following changes to the policy:</p>

<sup>9</sup> PPG on Plan-Making: <https://www.gov.uk/guidance/plan-making#maintaining-effective-cooperation>

Ref. No.	Respondent	Policy/ Para	Comments
			<p><i>The provision of community facilities alongside housing within sites allocated for uses including housing may <b>will</b> be considered acceptable where:</i></p> <ul style="list-style-type: none"> <li>- <i>there is an evident need for the type of facility concerned;</i></li> <li>- <i>the infrastructure/facilities are suitable to meet the needs of the community served <b>and the needs of future communities;</b></i></li> <li>- <i>the proposal complies with other policies in this Plan, including any site-specific requirements for additional or replacement services, facilities, enhancements, safeguards,</i></li> </ul>
REP/012	Department of Education	Viability	<p>The viability assessment for the Local Plan should take into account the full education needs and likely costs of provision associated with the level of development proposed, in accordance with Planning Practice Guidance on viability and DfE's guidance for local authorities on securing developer contributions for education.<sup>10</sup> Viability assessment should inform options analysis and site selection, with site typologies reflecting the type and size of developments that are envisaged in the borough/district. The total cumulative cost of complying with all relevant policies should not undermine deliverability of the plan, so it is important that anticipated education needs and costs of provision are properly incorporated in the Local Plan evidence base, to inform local decisions about site selection and infrastructure priorities. It is important that Local Plan viability factors in the cost of providing new school places as developers are expected to contribute towards this proportionally.</p> <p>In determining the number of early years children, school pupils and post-16 students likely to arise from development (an essential step before understanding the cost of provision), you may be interested in DfE's planned pupil yield methodology, which we aim to publish by the end of this year. This will enable a consistent approach among local authorities to the calculation of pupil yields, based on local evidence from recent developments. In the meantime, existing local approaches to estimate pupil yields remain valid and the Local Plan viability assessment and other evidence should include assumptions about the number of new school places generated by the level development required.</p> <p><b>Suggested Modifications:</b></p> <p>DfE can offer the following advice in relation to build cost evidence for the delivery of schools. DfE's Guidance<sup>11</sup> advises that the assumed cost of school places should be based on the national average costs (for both new schools and school expansions) published in the DfE school place scorecards.<sup>12</sup> The scorecards and their supporting guidance direct you on how to adjust the averages to factor in regional variation. It is advised that the national average is used as a baseline, as local evidence is likely to provide too small a sample for underpinning a robust evidence approach. However, for particular projects where there are known abnormalities or other evidence for higher costs, these can be used instead. Please also refer to paragraph 17 of the Guidance regarding Special Educational Needs school places.</p> <p><b>Conclusion</b></p> <p>Finally, I hope the above comments are helpful in assessing CBC's Local Plan viability, with specific regard to the provision of new school places as critical social infrastructure.</p>

<sup>10</sup> Planning Practice Guidance at <https://www.gov.uk/government/collections/planning-practice-guidance> and DfE guidance at <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>.

<sup>11</sup> <https://www.gov.uk/government/publications/delivering-schools-to-support-housing-growth>

<sup>12</sup> <https://www.gov.uk/government/collections/school-places-scorecards>

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			<p>Please notify DfE when any further evidence is published.</p> <p>Please do not hesitate to contact me if you have any queries regarding this response. DfE looks forward to continuing to work with you and CBC to develop a sound Local Plan which will aid in the delivery of new schools.</p>
REP/062	Environment Agency	Vision para. 2.34	<p>Dear Sir/Madam</p> <p><b>Crawley Submission Local Plan Regulation 19 Consultation</b></p> <p>Thank you for consulting us on the draft Local Plan.</p> <p>Having reviewed your document, we find it “SOUND” subject to some minor changes for clarification purposes.</p> <p><b>DRAFT LOCAL PLAN</b></p> <p><b>Crawley 2035</b></p> <p><b>Paragraph 2.34 (page 25)</b></p> <p>The last 2 sentences of the paragraph – <i>“Another point that should possibly be included in the section of environmental sustainability is the risk of stress on sewage infrastructure as the population grows. This may lead to negative impacts on water quality.”</i></p> <p>These comments were provided by us after reviewing the draft Local Plan, which have been included in this paragraph, however, this does not explain whether the issue of stress on sewage infrastructure is being included in the Local Plan or not.</p> <p>Please clarify whether stress on sewage infrastructure will be considered in this section on environmental sustainability.</p>
REP/062	Environment Agency	SD1	<p><b>Sustainable Development</b></p> <p><b>Strategic Policy SD1: Presumption in Favour of Sustainable Development</b></p> <p><b>We recommend the following for clarification purposes.</b></p> <p>Although this policy is directed at Sustainable Development, there is no reference to water resources / water quality. As water quality is closely related to water use, which in turn is an important part of sustainable development.</p> <p><b>Suggested Modifications:</b></p> <p>We would recommend an additional strategic objective within SD1 to ensure that the water environment is also a consideration. For example, no development should impact negatively on the quality or status of water bodies.</p>
REP/062	Environment Agency	IN1	<p><b>Infrastructure Provision</b></p> <p><b>Strategic Policy IN1: Infrastructure Provision</b></p> <p>Last Paragraph <i>“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.”</i></p> <p><b>Suggested Modifications:</b></p> <p>Considering the threat to water quality from the growing population and large developments, it would be beneficial to include water quality monitoring in section 106 agreements to ensure no deterioration of the status of water bodies, especially with large developments. Monitoring should be during construction and post-construction. Water quality should be more clearly highlighted as a concern, as has been done for example with air quality and green infrastructure. Water quality has been included within infrastructure, but impacts on water quality are wide ranging and not only related to provision of sewage infrastructure.</p>
REP/062	Environment Agency	GAT1	<p><b>Gatwick Airport</b></p> <p><b>Development of the Airport</b></p> <p><b>Strategic Policy GAT1: Development of the Airport with a Single Runway</b></p>

Ref. No.	Respondent	Policy/ Para	Comments
			<b>We support this policy.</b> We welcome the reference in Policy GAT1 regarding flood risk in relation to the development of Gatwick Airport with a single runway. Areas of the Airport are at risk to fluvial flooding, additional areas with impermeable surfaces could also lead to an increase in the rate and volume of surface water runoff. Future development at the Airport will need to ensure that flooding can be managed on site and not increase the risk to flooding elsewhere.
REP/062	Environment Agency	H2	<p><b>Meeting Housing Needs</b>  <b>Strategic Policy H2: Key Housing Sites</b>  Housing, Biodiversity and Heritage Site  <input type="checkbox"/> Land east of Balcombe Road/Street Hill, Pound Hill  <b>This policy needs to be amended for clarification purposes before we can support it.</b></p> <p><b>Suggested Modifications:</b>  This allocation of this site must also ensure that biodiversity net gain is achieved, and that sufficient corridor for wildlife is retained along the stream corridor as highlighted in the previous local plan.  The highlighting of the area for housing is not helpful as it includes areas of floodplain along the stream corridor and does not therefore demonstrate full protection of the site's assets. We therefore recommend the way housing area is highlighted is altered or some of the principles of the development change. E.g. reducing the amount of land take by the proposed housing allocation.  <b>Forge Farm (page 150)</b>  It is not clear from the mapping where the additional housing supply land is proposed. Given the amount of semi natural habitat covering remaining areas of this site and the requirement to provide biodiversity net gain the authority may need to think strategically whether on site net gain is realistic and may have to work with neighbouring authorities in order to help provide strategic corridors for wildlife elsewhere.  No significant new sites are proposed within the borough boundaries.  It would be helpful if supplementary guidance looks realistically at how Biodiversity Net Gain can be achieved in collaboration with neighbouring authorities.</p>
REP/062	Environment Agency	G11 G12 G13	<p><b>Green Infrastructure &amp; Biodiversity</b>  <b>Strategic Policy G11: Green Infrastructure; Strategic Policy G12: Biodiversity and Net gain; Strategic Policy G13: Biodiversity Sites</b>  <b>We support these policies</b></p>
REP/062	Environment Agency	SDC1 SDC3	<p><b>Sustainable Design and Construction</b>  <b>Strategic Policy SDC1: Sustainable Design and Construction; Policy SDC3 Tackling Water Stress</b>  <b>We support these policies.</b>  There is one instance of the phrase "extreme water stress" in Paragraph 15.5. Elsewhere (and in the Sustainability Appraisal) your terminology is consistent with our own, as we pointed out in the Regulation 18 consultation. We use "serious water stress". We support the need to tackle the serious water stress in the borough, and welcome the amount of attention this is given in the Plan. In particular, we are pleased to see Strategic Policy SDC3 specifically devoted to tackling water stress. We support the requirement for domestic developments to meet the 110 litres per person per day standard. The more stringent 100 litres target is supported by the ambition of Southern Water in its Water Resources Management Plan for average consumption across all homes by 2040. The target of 80 litres proposed for significant, strategic scale developments will be challenging, but will help in reducing the overall</p>

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			<p>average to nearer 100. The mention of greywater reuse and rainwater harvesting in para 15.39 is appropriate in the context of achieving 80 litres.</p> <p>We welcome the requirement in both Strategic Policies SDC1 and SDC3 for new non-domestic buildings to achieve the BREEAM Excellent standard except where not technically feasible.</p> <p>We note that the Water Cycle Study has yet to be updated, and the justification for these high standards rests partly on the conclusions of the previous one. We hope the new document will also support the policies presented.</p> <p>In section 15.42, the requirement for non-domestic (and domestic) developments to install meters is not confined to water stressed areas. This is the norm, unless it concerns extensions, and nearly all non-domestic properties are already metered anyway.</p>
REP/ 062	Environment Agency	EP1	<p><b>Environment Protection Flood Risk (page 196) -Paragraphs 16.7 Development and Flooding - 16.13</b></p> <p>The draft Local Plan recognises the need to ensure that the risk to flooding is an essential factor to take into account as part of the ongoing development of Crawley Borough, this is highlighted by sections 16.7 and 16.13. Importantly, these paragraphs state that development must be planned with flood risk in mind, both in terms of protecting Crawley residents, and ensuring that flood risk is not increased elsewhere. In addition, the Local Plan recognises that climate change should form part of the assessment process when considering development in relation to flood risk. These are essential factors in ensuring that any future development could be considered as sustainable.</p> <p>The Strategic Flood Risk Assessment (SFRA) and updated flood risk modelling for the Upper Mole Catchment are referenced within the draft Local Plan, Sustainability Appraisal, and also within the draft infrastructure plan. The updated flood risk modelling is likely to, in some areas, change the extent of the areas that are considered to be at risk to fluvial flooding from main rivers. We note that comment is made by Crawley in the draft plan that the SFRA and the Upper Mole modelling are currently being updated. Once these two items have been updated, this should be reflected with the draft Local Plan and its supporting evidence base.</p> <p><b>Strategic Policy EP1: Development and Flood Risk</b></p> <p><b>We support this policy</b></p> <p>The requirements of the NPPF and associated PPG Flood Risk and Coastal Change are interpreted within and incorporated into Strategic Policy EP1. The manner in which the draft Local Plan sets out the requirements of the NPPF and its associated Flood Risk and Coastal change PPG within EP1 appear to be reasonable. Section 16.20 sets out the definition of Flood Zone 3b, this definition has been previously agreed with the Environment Agency.</p>
REP/ 062	Environment Agency	EP2	<p><b>Non-strategic Policy EP2: Flood Risk Guidance for Householder Development and Small Non-Residential Extensions</b></p> <p><b>We support this policy</b></p> <p>This sets out guidance for householder development and small non-residential extensions. The inclusion of this policy is welcomed, small scale development can have a negative cumulative impact on flood risk, as well as being at risk to damage that flooding causes. The requirement to provide a Flood Risk and Resilience Statement for these types of development offers clear guidance on how to approach smaller scale development at risk to flooding, whilst ensuring the information that needs to be provide is appropriate to the nature and scale of these types of development. It is noted that EP2 contains descriptions of the types of development that fall under this Policy, which should assist in determining when a full Flood Risk Assessment is needed, and when a Flood Risk and Resilience Statement is appropriate. We welcome the reference in Policy GAT1 regarding flood risk in relation to</p>

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			the development of Gatwick Airport with a single runway. Areas of the Airport are at risk to fluvial flooding, additional areas with impermeable surfaces could also lead to an increase in the rate and volume of surface water runoff. Future development at the Airport will need to ensure that flooding can be managed on site and not increase the risk to flooding elsewhere.
REP/062	Environment Agency	EP3	<p><b>Strategic Policy EP3 Land Quality</b>  <b>We support this policy.</b>  We are pleased to note the inclusion of requirements to investigate, and if necessary, remediate potentially contaminated land, and to only permit development that has the potential to cause land or water contamination, with appropriate mitigation measures.</p>
REP/062	Environment Agency	ST4	<p><b>Sustainable Transport</b>  <b>Strategic Policy ST4 Safeguarding of a Search Corridor for a Crawley Western Link Road</b>  <b>We do not support the inclusion of the route option for the reasons set out below.</b>  Policy ST4 has a significant potential clash with Willoughby Fields (LNR) and Local Wildlife Site.</p> <p><b>Suggested Modifications:</b>  It is therefore recommended that this site is highlighted on the proposals map and the safeguarding/search corridor is widened so that important wildlife areas can be avoided should the decision be taken to proceed with this proposal. At this stage we cannot support the inclusion of this route option due to the proposed search area.</p>
REP/062	Environment Agency	SA/SEA	<p><b>SUSTAINABILITY APPRAISAL</b></p> <p><b>Water resources and efficiency</b>  In the table below para 5.11, "Reduction of Water Consumption" is one of the key topics, but there is no relevant assessment criterion.</p> <p><b>References on p51 &amp; p86:</b>  Thames Water has published a "Revised draft Water Resources Management Plan 2019" and updates to it.  Southern Water has published a final "Water Resources Management Plan 2020–70" South East Water has published a final "Water resources management plan 2019".  SES Water has published a "FINAL Water Resources Management Plan 2019"  Page 206 - Appendix A: Sustainability Objectives – To promote sustainable use of water resources and improving the quality of water bodies should one of the key sustainability objectives. Water resources and water quality are often forgotten because these issues are excluded when listing main objectives.  Page 195 - 15.43 <i>The EU Water Framework Directive establishes a framework for the protection of inland surface waters (rivers and lakes), transitional waters (estuaries), coastal waters and groundwater. The government has stated that the environmental protections arising from this and other EU legal instruments will remain in place after the UK leaves the European Union, and the 2018 '25 year Environment Plan' has announced the intention to improve 'at least three quarters of our waters to be close to their natural state as soon as practicable'</i>138. <i>The council supports this work through the proper and sensible management of water in all new development.</i>  It is encouraging that the council supports protection of the water environment although this needs to be reflected further in the objective SD1 of the draft Local Plan.</p>

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			<p><b>Flood Risk</b>  Due to the flood risk that exists within Crawley and the constraints in terms of available land for future development, ensuring that there is suitable and robust Policy to ensure that flood risk is suitably assessed and managed is essential. The inclusion of specific Policy within the draft Local Plan and the Sustainability Appraisal (SA) in relation to flood risk is noted and welcomed. The SA highlights that without specific local Policy related to flood risk management, National Policy and guidance, as well as Environment Agency advice, would be followed. However, Crawley have recognised that having local Policy would better inform future development proposals in terms of flood risk, especially in the face of climate change. This is welcomed, we are supportive of Crawley's approach in the choice of Option 2 for Policy EP1.  In terms of Policy EP2, the choice of Option 1 is also supported. This type of development can have a cumulative impact on flood risk, by providing specific guidance on smaller scale development it also offers those who wish to carry out, for example, householder extensions in flood risk areas, clear guidance on how to approach making an application.  We hope you find our comments useful. If you have any queries please do not hesitate to contact me.</p>
REP/ 011	Highways England	SD3 EC1 H1 H2 ST1 ST4	<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. With regards to Crawley, the SRN comprises the M23 and A23, with the M25 nearby.</p> <p><b>Crawley's Unmet Housing Need/ Developments in Vicinity of Crawley</b>  We note that "Even with further development within the borough, Crawley will not be able to meet its housing needs in full and possibly not all of its employment needs", with a need for 11,280 dwellings (with 5,355 planned for delivery 2020-2035) and 20,541 new jobs. As a result, there is a requirement for neighbouring authorities (especially Horsham, Mid Sussex and Reigate &amp; Banstead) to accommodate Crawley's unmet needs (5,925 dwellings).  It is Highways England's view that in order for the overall Local plan and individual developments to accord with national planning and transport policy full, timely coordination with neighbouring authorities will need to be undertaken in assessing the transport impacts upon the local and strategic road networks. This will especially be the case with regard to the significant development to be sited in neighbouring authorities just outside Crawley's boundaries. The sites include the prospective West of Ifield development with associated Crawley Western Relief or Link Road (as outlined in policy ST4) and Horley Business Park developments. In this respect, we note that para 1.14 states "Transport Modelling is to be updated taking into account the cumulative impacts of plans, policies and proposals within adjoining authorities".  We note that in addition to development just outside the borders of Crawley, there is the prospective expansion Gatwick Airport and/or North Crawley Area Action Plan as outlined in SD3 within the borough.</p> <p><b>Transport Evidence Base</b>  We note that the transport evidence base in support of the Local Plan has yet to be prepared, despite the Council consulting on its Reg. 19 plan.</p>

Ref. No.	Respondent	Policy/ Para	Comments
			<p>We set out our position in June 2019 when consulted on the Infrastructure Plan. It is that because the Local Plan Review involves a change from the current adopted Crawley 2030 Local Plan in terms of the plan years and housing numbers, an updated, robust Transport Assessment will be required.</p> <p>It should include evidence on the location of strategic development within the borough. Associated with this, and in their own right, the evidence base will require assessments for the M23 Junctions 9 to 11 and along the M23 Spur to Gatwick. This because the model used previously is now unlikely to be suitable for further use.</p> <p>In this respect, we note that the need for an updated Transport Assessment is acknowledged in Chapter 17, and we have recently been liaising separately with Crawley Borough Council on our input to the transport modelling brief.</p> <p>We therefore look forward to working with Crawley Borough Council and receiving further information on the transport modelling for review.</p> <p>Until this Transport Assessment is undertaken and agreed, together with any mitigation required (demonstrated to be in accordance with standards, fully funded and deliverable), Highways England will have no option but to object to the development proposals outlined in the revised Crawley Local Plan 2020-2035.</p> <p><b>Assessment of Individual Developments</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> <p>However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p> <p><b>Suggested Modifications:</b></p> <p>It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.</p> <p>Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.</p> <p>However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.</p>

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REP/061	Historic England	SD1	<p><b>Crawley Submission Local Plan Regulation 19 Consultation</b></p> <p>Thank you for your email of 20 January 2020 inviting comments on the above consultation document.</p> <p>As the Government's adviser on the historic environment Historic England is keen to ensure that the protection of the historic environment is fully taken into account at all stages of the planning process. This includes formulation of local development policy and plans, supplementary planning documents, area and site proposals, and the on-going review of policies and plans.</p> <p>There are many issues and matters in the consultation document that are beyond the remit and concern of Historic England and our comments are, as required, limited to matters relating to the historic environment and heritage assets. We note that as an early stage in the formulation of a local plan the current document may be subject to significant change and consequently we consider it appropriate to limit our comments to more general matters; we will comment more specifically and in detail at later stages in the plan making process as appropriate. In this respect, you should not take the comments below as the definitive view of Historic England on the matters contained in the plan; they are provided for general guidance in the iterative process of preparing appropriate policies for the historic environment.</p> <p>The objective of the National Planning Policy Framework, inter alia, to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 185); and contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 20 d)). These underpin the purpose of the planning system to achieve sustainable development.</p> <p>We welcome the statement within the Crawley 2035: A Vision section that 'The rich heritage which has shaped what the town is today will be respected, protected and enhanced'. We support the overarching policy in this respect, Strategic Policy SD1: Presumption in Favour of Sustainable Development that includes recognition of this in bullet point 3.</p> <p>A positive strategy in the terms of the NPPF is not a passive exercise but requires a plan for the maintenance and use of heritage assets and for the delivery of development, including within their setting, that will afford appropriate protection for the asset(s) and make a positive contribution to local character and distinctiveness.</p>
REP/061	Historic England	SD3	<p>We have no objection in principle to the designation of Strategic Policy SD3: North Crawley Area Action Plan but it should be noted that there are a number of designated heritage assets (listed buildings and scheduled monuments) within the defined area that would need to be taken account of in future planning of the area. This includes, in particular, listed buildings within and adjacent to the 'Indicative Search Corridor for the Western Link Road (Policy ST4)'.</p>
REP/061	Historic England	CL2	<p>We note, and support, that Strategic Policy CL2: Making Successful Places: Principles of Good Urban Design requires good design that reflects the defining characteristics of each neighbourhood within the plan area, and that reinforces the existing character and distinctiveness of each; and, that the protection and enhancement of heritage assets is integral to this.</p>
REP/061	Historic England	CL3	<p>We support Strategic Policy CL3: Local Character and Design of New Development; particularly in its reference to protecting, enhancing and reinforcing 'heritage assets and their settings'.</p> <p>The location, design and use of future development can contribute to local identity and distinctiveness, and safeguarding heritage significance. We agree that Policies CL4-CL6 set out a series of design parameters that will help to ensure that high-quality design is achieved in new development and sustainable forms of urban planning are delivered, including the protection of heritage assets.</p>
REP/061	Historic England	CL7	<p>We support Strategic Policy CL7: Important and Valued Views and the supporting reasoned justification that seek to protect views of heritage assets and within historic areas.</p>

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REP/061	Historic England	CL8	Strategic Policy CL8: Development Outside the Built-Up Area is supported.
REP/061	Historic England	DD1	In Strategic Policy DD1: Normal Requirements of All New Development we suggest inclusion of a reference to heritage in bullet b); e.g. '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 building, structures or landscape features that are of heritage significance or contribute to local character, setting and context'.
REP/061	Historic England	DD7	We support Non-Strategic Policy DD7: Advertisements in its references to considering the effects on the character of the locality, including 'scenic, historic, architectural or cultural value or features' in sub-paragraph a).
REP/061	Historic England	HA1	<p>We support the broad intention of Strategic Policy HA1: Heritage Assets</p> <p><b>Suggested Modifications:</b></p> <p>But suggest the following amendments to strengthen the purpose of the policy and better reflect the intentions of the NPPF:</p> <p>Revise the final bullet point of the first paragraph to read Other assets with non-designated archaeological interest, assets of equivalent significance to scheduled monuments. <del>Especially within Archaeological Notification Areas in Crawley identified by West Sussex County Council</del> to reflect NPPF paragraph 194 and footnote 63.</p> <p>In paragraph 2 replace 'not lost' with conserved and enhanced to meet the test of NPPF paragraph 194.</p> <p>Add into paragraph 4 – 'If, in exceptional circumstances, as defined by paragraph 194 of NPPF, .... And it has been demonstrated to achieve substantial public benefits that outweigh that harm or loss,...' to reflect the intention of NPPF paragraph 195.</p> <p>Amend paragraph 5 to: 'In exceptional cases where a heritage asset is considered to be suitable for loss or replacement, <del>and it has been demonstrated its site is essential to the development's success</del> by being in accordance with the above criteria, 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'. This wording would better reflect NPPF paragraphs 195 and 196.</p> <p>We would like assurance that an up-to-date Evidence Base exists for the historic environment elements of the Crawley Local Plan or that such is in preparation. Paragraph 1.14 of the draft Local Plan includes reference to 'ASEQs and Locally Listed Buildings Heritage Assessment; ... Landscape Character Assessment; Historic Parks &amp; Gardens Review; ...' which date from 2010, 2012, and 2013 respectively. We have been unable to locate any other directly relevant more recent reports or studies. Paragraph 6.8 et al refer to the Crawley Heritage Strategy (2008), but no update to this appears to exist. The only other reference to possible evidence is given in footnote 61 on page 78.</p> <p>A Heritage Topic Paper or similar assessment document prepared in advance of, or alongside (if not already undertaken), the local plan can be a useful tool to amplify and elaborate on the delivery of the positive heritage policies in the Local Plan. Some local planning authorities have chosen to support their conservation strategy within the Local Plan using a topic specific SPD.</p> <p>These comments are based on the information provided by you at this time and for the avoidance of doubt does not reflect our obligation to advise you on, and potentially object to, any specific development proposal which may subsequently arise from this or later versions of the plan and which may, in our view, have adverse effects on the historic environment.</p> <p>If you would like further advice on the content of this letter or to discuss how the draft Local</p>

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			Plan could be revised to better reflect the intention of the NPPF, please contact me.
REP/061	Historic England	HA2	We support policy Strategic Policy HA2: Conservation Areas.
REP/061	Historic England	HA4	Strategic Policy HA4: Listed Buildings and Structures is supported.
REP/061	Historic England	HA7	Strategic Policy HA7: Heritage Assets of Archaeological Interest is supported.
REP/061	Historic England	ST4	Strategic Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road – see comment above. Heritage assets are likely to be impacted by a road in the area indicated in the map on page 214 and these should be factored into any assessment of the appropriate route alignment.
REP/061	Historic England	SA/SEA	<p>Crawley Local Plan Strategic Environmental Assessment Scoping Report</p> <p>Thank you for your email of 20 January 2020 inviting comments on the Scoping Report for the above strategic environmental assessment. Historic England is a statutory consultation body in relation to the SEA Directive in regard to any matters affecting the historic environment. We are content that the scoping report for Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</p> <p>Historic England has prepared generic guidance with regards to our involvement in the various stages of the local plan process which you may find helpful in preparing the Sustainability Appraisal. This is available to download here: <a href="https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/">https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/</a>.</p> <p>This opinion is based on the information provided by you and for the avoidance of doubt does not affect our obligation to advise you on, and potentially object to any specific development proposal which may subsequently arise from this or later versions of the plan which is the subject to consultation, and which may, despite the SEA, have adverse effects on the historic environment.</p>
REP/033	Horsham District Council	SD3	<p>Thank you for consulting us on the Draft Crawley Borough Local Plan 2020 -2035. We are grateful for the opportunity to be able to comment on your emerging plan. Horsham District Council recognises that your authority faces considerable challenges in ensuring it can meet the future needs of Crawley within what is a tightly bound administrative area. Overall we consider that the plan has positively sought to balance the provision of those future needs with other wider objectives in a manner that contributes to achieving sustainable development.</p> <p>I would also take the opportunity to reaffirm Horsham District Council's commitment to continued close cooperation and joint working between our councils, reflecting our joint housing market area and common functional economic market area.</p> <p>We do have a number of detailed comments on the draft document, which follow and build on comments made in our letter dated 16 September 2019 responding to the earlier Regulation 18 consultation on the Crawley Borough Local Plan 2020-2035. We will provide these separately using comment forms for your ease of reference and inputting, but I have nonetheless set these out together in this letter – the comments that follow are identical word-for-word to the comment forms.</p> <p>We support this policy in principle, but consider its effectiveness could be improved. It is recognised the AAP will provide opportunities to increase housing and employment provision within Crawley Borough, and this should feed into an assumption that the unmet need will be reduced (see further comments on Policy HP1 in particular).</p>

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			<p><b>Suggested Modifications:</b> Request that specific reference is made to fact that the safeguarded land extends into Horsham district, therefore close joint working will be needed to ensure a consistent approach between the AAP and Horsham LP policy on Gatwick safeguarding going forward.</p>
REP/033	Horsham District Council	CL4	<p>We support this policy in principle, but consider its effectiveness could be improved.</p> <p><b>Suggested Modifications:</b> Change sought: Request clearer cross reference to Policy CL4 which specifies minimum densities.</p>
REP/033	Horsham District Council	CL5	<p>We support this policy in principle, but consider it is not justified as stands and that its effectiveness could be improved. We welcome that the policy sets out minimum densities that are higher than previously used. This is an important means of ensuring no stone is unturned in seeking to maximise meeting identified housing needs in Crawley. However it is not clear what the evidence is for selecting these specific density ranges. This should be made fully transparent to ensure that the policy is justified. It is also not clear from this policy exactly where these densities would apply: although examples are given, this does not provide sufficient certainty. Therefore the policy is not fully effective.</p> <p><b>Suggested Modifications:</b> Change sought: It is considered necessary to prepare a densification study to consider, amongst other things, appropriate densities. This should include a spatial analysis of what is appropriate, or transparently present the evidence already gathered to evidence this.</p>
REP/033	Horsham District Council	DD1	<p>We support this policy which is clear in its encouragement of efficient use of land as part of good design.</p>
REP/033	Horsham District Council	OS1	<p>We support this policy in principle, but consider that its effectiveness could be improved. If an area of open space is surplus to requirements, it presents an opportunity to re-use the site for housing and could potentially include new public recreation space. This in turn helps reduce the unmet development needs.</p> <p><b>Suggested Modifications:</b> Change sought: Request that Policy OS1 is worded more positively to more explicitly acknowledge the opportunities presented by surplus open space to support meeting housing need whilst improving recreational opportunities, and to better reflect Policy H3f.</p>
REP/033	Horsham District Council	EC1	<p>We support this policy in principle, but consider that its effectiveness could be improved. We note the predicted shortfall in employment land supply and have also noted the request recently made by Crawley Borough Council as part of the Duty to Cooperate for Horsham District to assist in meeting this need. Horsham District is seeking to significantly increase the number of high quality jobs in the District to ensure that the employment needs of significant housing growth needed in the District is met and provides choice for residents to live and work locally. There is a clear synergy between this and providing for the needs of Crawley. As you will be aware land to the West of Crawley, but is within Horsham District is being promoted for development. Whilst no decision has been made as to whether it would be appropriate to allocate this site, we would expect any strategic housing development in Horsham District to include significant levels of employment of a type that is attractive to new residents of that development, on a '1 job per household' basis, to increase the sustainability of the new community and reduce the need to travel.</p>

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			<p>It is therefore important that the joint working outlined in Strategic Policy EC1 (v) leads to new employment that primarily meets the need of the new communities born of any strategic development.</p> <p><b>Suggested Modifications:</b>  Change sought: It is requested that Policy EC1 has text added to clarify that any employment development provided as part of strategic sites 'at' Crawley, but outside its boundaries, is planned to meet the needs of the Crawley/Gatwick FEMA first and foremost, and provide local jobs.  Paragraph 9.23 (Strategic Policy EC1: Sustainable Economic Growth) The effectiveness of Policy EC1 could be further improved by making the change set out below.  Change sought: Amend text to clarify that whilst the scope for strategic employment growth will be investigated as part of a North Crawley AAP, the priority will be to accommodate additional housing within Crawley borough, insofar as is commensurate with other local plan policies.</p>
REP/ 033	Horsham District Council	TC3	<p>We support this policy in principle, but consider it is not justified as stands and that its effectiveness could be improved. It is considered that there may be further opportunities for mixed-use proposals which enhance the town centre to include a greater element of residential development, which can contribute to reducing the unmet need. This should be reflected in the policy. This view has been formed on the premise that there has not been evidence presented alongside the draft Local Plan to quantify opportunities to provide further residential units, of a higher-density nature, to complement and support the vitality of the town centre.</p> <p><b>Suggested Modifications:</b>  Change sought: It is considered necessary to prepare a densification study. This should include detailed analysis of redevelopment and regeneration opportunities in the town centre area, in a way that maximises opportunities to address the unmet housing need. This may lead to an increase to the 1,500 net dwellings increase set out in Policy TC3 (iv).</p>
REP/ 033	Horsham District Council	H1	<p>We support aspects of this policy, in particular that all reasonable opportunities will be considered to develop on brownfield sites and surplus green space; capitalise on town centre living, and seek out further opportunities on the edge of Crawley. However we consider that the policy is not justified as stands, its effectiveness could be improved, and needs further work to demonstrate that it is positively prepared.</p> <p>Firstly, we do not consider that the remaining unmet need figure of 5,925 dwellings total has been fully justified. Whilst acknowledging that land supply in Crawley is highly constrained, evidence has not been provided that all opportunities for providing further housing within Crawley's boundary have been exhausted. For example, Policy CL5 sets minimum densities for development, and Policy TC3 identifies a number of Key Opportunity Sites in the Town Centre. Paragraph 11.19 states that at least 1,500 dwellings are anticipated across all of these sites (consistent with Policy H1). Currently, we do not consider that there is clear evidence of how this number has been arrived at, or whether a comprehensive study of opportunity sites within the town centre, and appropriate densities within these, has been undertaken.</p> <p>Secondly, it is also not clear how opportunities for estate regeneration (and associated densification) have been looked at. The draft Local Plan in paragraph 12.55 states that there are no estate regeneration projects planned in Crawley. We would welcome discussion as to why this has not been taken forward as an option for increasing housing delivery within Crawley Borough whilst also delivering significant community benefits.</p>

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			<p>Thirdly, we note that the Strategic Housing Land Availability Assessment (SHLAA) supporting the emerging Local Plan makes an assumption that the Gatwick southern runway may still come forward, and incorporates an assumption that maximum permissible noise levels may therefore be exceeded. Whilst we recognise that this situation is complex, this change appears to have had the effect of ruling out large sites of several hectares which had previously been included in the housing trajectory for the 2015 Local Plan. The SHLAA recognises that such sites may be reconsidered as part of the North Crawley Area Action Plan. It is however considered that in advance of such a review, it is not necessarily appropriate to fully rule out sites at this stage, particularly when given the increase in housing need for Crawley and for the housing market area. Again, we would welcome further discussion around these points.</p> <p>It is suggested that further areas of investigation regarding land use efficiency and maximising delivery within Crawley Borough could reasonably include:</p> <ol style="list-style-type: none"> <li>i. Consideration as to whether a more generous assumption relating to windfall development (currently assumed at 55 dwellings per hectare) may be appropriate. It is noted that the draft Local Plan refers on page 223 to a background document 'Windfall Allowance Review 2020-2035.' However we have not been able to find this document on your website.</li> <li>ii. Positive identification at the plan-making stage of any further surplus or under-used green space or industrial land in Crawley Borough. The need to protect and enhance fit-for-purpose green infrastructure is supported, but it is noted that currently published open space studies are some 6 years old and may now be in need of update;</li> <li>iii. Reassess whether sites in the SHLAA should have been found to be unsuitable for development. The airport noise contour issue has already been mentioned above, and there are further justifications given for rejecting sites that could be better evidenced, e.g. site adjacent (but not within) a flood risk area, or the higher infrastructure costs associated with redeveloping industrial sites.</li> </ol> <p>To ensure that a robust unmet need figure can be agreed, and the points above are considered further, it is requested that a comprehensive densification study is undertaken, to consider these points and others as appropriate. This is essential to ensure a robust understanding of how much of the Crawley housing needs will remain unmet, and therefore form the basis of the discussions over the extent to which Horsham District Council can meet this need.</p> <p>We also request an alternative trajectory and target which reflects the likely scenario of some or all of the Gatwick Expansion safeguarding being removed as a result of the forthcoming AAP.</p> <p>This will assist in Duty to Cooperate discussions, and may be critical to the unmet need housing figure should the Gatwick safeguarding policy be removed entirely in the course of the examination.</p> <p><b>Suggested Modifications:</b> Change sought:</p> <ul style="list-style-type: none"> <li>• To be effective, and meet the test of positive planning, the policy should additionally refer to opportunities arising from increased densities including increasing building heights and fully exploiting surplus garden land, and estate regeneration.</li> <li>• To ensure that a robust unmet need figure can be agreed, it is requested that a comprehensive densification study is undertaken, to consider points i, ii and iii above, and others as appropriate. This is essential to ensure a robust understanding of how much of the Crawley housing need should in principle be accommodated by neighbouring authorities including Horsham district.</li> </ul>

Ref. No.	Respondent	Policy/ Para	Comments
			It is requested that an alternative trajectory and target which reflects the likely scenario of some or all of the Gatwick Expansion safeguarding being removed as a result of the forthcoming AAP.
REP/ 033	Horsham District Council	H2	<p>We support this policy in principle, but consider it is not justified as stands. As set out in our comments to earlier policies (and in particular Policy H1), there is insufficient evidence to support the overall number of dwellings suggested, given that further sites could be allocated if further investigations through a densification study were made.</p> <p><b>Suggested Modifications:</b>  Change sought: It is considered necessary to prepare a densification study. This should include analysis of whether assumptions built into policies as drafted, for example on town centre redevelopment opportunities, surplus green spaces, and estate regeneration should be different and if so, whether this could yield significant further housing capacity in Crawley.  It is also requested that reference is made to the alternative scenario of Langley Green and Forge Wood sites coming forward as a result of Gatwick safeguarding being removed (as stated in 12.28), with associated housing capacities and an alternative trajectory and unmet need figure.</p>
REP/ 033	Horsham District Council	H3b	We support this policy which is clear in its encouragement of efficient use of land in a number of ways.
REP/ 033	Horsham District Council	H3c	We support this policy. It is considered that there may be further opportunities for the town centre area and mixed use developments to provide more housing to help meet the unmet need in Crawley, as set out in our comments to Policies H1 and H2.
REP/ 033	Horsham District Council	H3d	We support this policy which encourages efficient use of land through building upwards.
REP/ 033	Horsham District Council	H3f	We support this policy which strikes an appropriate balance between protecting and enhancing valued open spaced whist taking a pragmatic approach to allowing some housing development in certain circumstances.
REP/ 033	Horsham District Council	H3g	<p>We support this policy in principle, but consider it is not justified as stands and that its effectiveness could be improved. Given the pressing need for housing in the area and unmet housing need, it is considered imperative that estate regeneration opportunities are explored as this is a potential source of additional housing supply that is, to a great extent, within the control of CBC. This could form part of a densification study, and is necessary to ensure that no stone is left unturned. Such a study may identify further broad areas for development to yield additional housing in the later years of the Plan period. We welcome paragraph 12.72 and the fact it has now been moved to before the policy (as suggested in our response to your Regulation 18 consultation).</p> <p><b>Suggested Modifications:</b>  Change sought: It is considered necessary to prepare a densification study. This should include analysis of whether and estate regeneration could play a part in providing additional housing within Crawley's administrative boundaries.</p>
REP/ 033		Policy H3g part ix	Policy H3g part ix is not effective. Including reference to potential nomination rights for affordable housing to potentially be provided outside of Crawley borough is premature and therefore ineffective, given no such agreement in principle has been reached. This

Ref. No.	Respondent	Policy/ Para	Comments
	Horsham District Council		<p>bears in mind that Horsham District itself has a high assessed need for affordable housing (503 homes per year) meaning that there may be limited opportunity to meet a significant proportion of Crawley's affordable housing need on top.</p> <p><b>Suggested Modifications:</b> Change sought: Request removal and similarly as a consequential change to the reasoned justification (see further comment on paragraph 12.76).</p>
REP/033	Horsham District Council	Para. 12.76	<p>Paragraph 12.76 is not effective as drafted – it currently states: “Whilst located within Mid Sussex or Horsham Districts, any urban extension on the edge of Crawley should be meeting the unmet housing needs arising from Crawley, and should therefore meet Crawley's specific needs for affordable housing, housing mix, type, and tenure.”</p> <p>It is premature to make this statement ahead of any agreement being reached as part of future joint work. HDC wishes to make clear that new development in Horsham district will address the needs of Horsham district in the first instance, as required by NPPF paragraph 35(a) in respect of the minimum requirement for a local plan to pass the 'positively prepared' test.</p> <p><b>Suggested Modifications:</b> Change sought: Request removal of this sentence.</p>
REP/033	Horsham District Council	ST4	<p>We support this policy subject to the following comment: The corridor for any future relief road will need to be agreed jointly with HDC as most of the route would be within the administrative area of Horsham. Any area of safeguarding should not prejudice this. It is noted that this is recognised in the supporting text. I do hope these comments are helpful. I would like to emphasise that they are made in anticipation of further constructive dialogue between our authorities, and with an expectation that areas of disagreement can be readily addressed, and quite possibly eliminated. Officers will be in touch further to arrange further discussions around this point and in respect of the Statement of Common Ground currently being worked upon.</p>
REP/066	Mid Sussex District Council	SD3	<p><b>Crawley Local Plan Review 2020 – 2035 – Submission version</b> Mid Sussex welcomes the opportunity to comment on the submission Crawley Local Plan Review (the Plan) and our detailed comments on the Strategic Polices of the Plan build on our earlier response to the Regulation 18 draft of the Local Plan. Mid Sussex welcomes the further work undertaken by Crawley since the publication of the draft Local Plan and the identification of additional sources of housing supply, resulting in another 550 units. In particular, Mid Sussex supports the revisions to policies which will ensure that there is a more effective use of land in meeting housing and other land use needs in line with the National Planning Policy Framework (NPPF). Mid Sussex has reviewed the Plan and accompanying evidence that has been prepared to support the Plan however it is noted that some of the evidence base, including Transport Assessment, Viability and Habitats Regulation Assessment have not yet been completed and therefore these comments are provided in this context. Mid Sussex may wish to make further comments as and when the evidence base is complete.</p> <p><b>Strategic Policy SD3: North Crawley Area Action Plan</b> Mid Sussex <b>supports this policy in principle</b> as it seeks to make more efficient use of land. However, the Council consider that the Policy could be <b>more effective</b>.</p>

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			<p>Policy SD3 makes provision for the preparation of an Area Action Plan (AAP) for the area of land to the south of Gatwick Airport that has historically been safeguarded to accommodate the possible construction of an additional runway and associated facilities. Mid Sussex welcomes the approach to review the opportunities for development within this location, alongside the future growth needs of the airport through an AAP.</p> <p>The Council welcomes the clear commitment to commence work on the AAP within three months of the adoption of the Local Plan as this will provide certainty over its development.</p> <p>However, the Crawley Plan should recognise the significant opportunities presented by this land to take a strategic approach towards consolidating employment land in this location thereby facilitating release of underused employment land elsewhere in the Borough which could be used for much needed housing.</p>
REP/066	Mid Sussex District Council	CL4	<p>Strategic Policy CL4: Effective Use of Land: Sustainability, Movement and layout Mid Sussex <b>supports</b> this policy in principle however considers that it could be <b>more effective</b>. The NPPF is clear that where there is a shortage of land for meeting identified housing needs policies should ensure the use of land is optimised. Whilst this policy seeks the effective use of land it needs to be clear about how this will be achieved.</p> <p><b>Suggested Modifications:</b> <b>Change required:</b> Policy needs clarity over how policy objectives will be achieved.</p>
REP/066	Mid Sussex District Council	CL5	<p>Strategic Policy CL5: Form of New Development – Layout, Scale and Appearance Mid Sussex <b>supports this policy in principle</b> as it seeks to make more efficient use of land. However, the Council consider that the Policy could be <b>more effective</b>. The Council <b>supports</b> the concept of ‘compact development’ and the inclusion of density standards on some locations within the Town. However, the Council consider that the Policy could be <b>more effective</b> by being clearer. Whilst the Policy sets out minimum density standards across the Borough it states that residential density standards will be informed by Area Character Assessment. It is unclear from the supporting evidence if these Assessments have already been undertaken, and if not who will be responsible for preparing these.</p> <p><b>Suggested Modifications:</b> <b>Change required:</b> Make the application of the policy clearer.</p>
REP/066	Mid Sussex District Council	CL8	<p>Strategic Policy CL8: Development Outside the Built-up Area Mid Sussex <b>supports this policy in principle</b> however considers that it could be <b>more effective</b>. Mid Sussex made comments on the previous draft in relation to policy CL8: Development Outside the Built-up Area. Whilst we welcome the changes which have been made to the policy, the objective of the policy remains the same. Therefore, we wish to reiterate that opportunities for development within these areas should be positively assessed, particularly as Crawley has an unmet housing need. There can be opportunities for development within designated areas, including the AONB. As a rural district, the majority of Mid Sussex housing supply is within the countryside (i.e. outside built-up areas) and Mid Sussex District Council’s spatial strategy allocates land for development in the AONB to meet its adopted housing requirement, which includes some of Crawley’s unmet need.</p> <p><b>Suggested Modifications:</b></p>

Ref. No.	Respondent	Policy/ Para	Comments
			<b>Change required:</b> This policy needs to be amended to be a positively framed policy which promotes and supports some development outside of the Built-Up Area.
REP/066	Mid Sussex District Council	OS1	<p>Mid Sussex <b>supports this policy in principle</b> but considers that it could be <b>more effective</b>. Policy OS1 protects against development which would affect the use of open spaces, sport and recreational spaces unless it meets certain criteria. Given the limited supply of suitable housing land in Crawley, this policy should recognise the significant opportunities presented by the Gatwick Expansion Safeguarding to rationalise open space in order to release land for much needed housing.</p> <p><b>Suggested Modifications:</b>  <b>Change required:</b> The Policy needs to be amended to cross reference to Policy SD3 as the opportunities presented by the Gatwick Expansion Safeguarding land</p>
REP/066	Mid Sussex District Council	EC1	<p><b>Suggested Modifications:</b>  Mid Sussex <b>supports</b> this policy in principle however considers that it could be <b>more effective</b> in achieving the area's needs. Policy EC1 (iii) currently encourages the redevelopment and intensification of under-utilised sites in Main Employment areas. However, the opportunities presented by the Gatwick Expansion Safeguarding for rationalising Main Employment areas, have not been taken. This is missing an opportunity to release land for much needed housing.</p> <p><b>Change required:</b> The Policy needs to be amended to make a cross reference to Policy SD3 as the opportunities presented by the Gatwick Expansion Safeguarding land should form part of a comprehensive spatial strategy for meeting development needs.</p>
REP/066	Mid Sussex District Council	H3d	Mid Sussex <b>supports</b> this policy which supports upwards extensions in line with the NPPF and provides clear guidelines on assessment of proposals.
REP/066	Mid Sussex District Council	H3g paragraph 12.76	<p>Mid Sussex <b>objects</b> to this policy. It is neither <b>justified nor effective</b></p> <p>The submission version of the Plan continues to include a policy that seeks to provide policy criteria for the assessment of Urban Extensions outside of the Crawley administrative boundary, in policy H3g: Urban Extensions. Policy H3g provides the framework by which Crawley would assess applications outside the borough boundaries but are adjacent to Crawley. Whilst some amendments have been made to the policy Mid Sussex continues to have concerns and therefore comments on this policy are set out below: The Sustainability Appraisal of the MSDC District Plan (August 2016) sets out the conclusions of the 'Sustainability Assessment of Cross-Boundary Options', which assessed the unmet need of all neighbouring authorities. The evidence shows that there are strong migration and commuting links between the two authorities. These links are not constrained to the areas immediately adjacent to the administrative boundaries of the authorities. Broad locations for growth were assessed based on distance and linkages between areas based on historic commuting patterns. These broad locations cover most of Mid Sussex, which indicate any unmet need from Crawley could be located anywhere in this District. Locations 'At Crawley' has identified locations which may not be the most sustainable location for growth in Mid Sussex, but until work on the District Plan Review is undertaken and all broad locations and sites are assessed, this is not known.</p> <p>It is unclear how this policy can be effective as it relates to land outside the Crawley boundary. An application within Mid Sussex, for example, would not be assessed against the policies within the Crawley Local Plan. As such the criteria within the policy can only be considered to inform Crawley's response during the consultation process on an application within an adjoining authority; and this should be made clear.</p>

Ref. No.	Respondent	Policy/ Para	Comments
			<p>It is not sufficiently clear what is meant by the term 'Urban Extension', both in terms of scale and location. This is important because some criteria would not apply to all developments. For example, smaller scale sites would not support a neighbourhood centre, or require a masterplan. The preparation of a Joint Area Action Plan may not be necessary in all circumstances. This is acknowledged in the supporting text but not within the policy. Through Duty to Co-Operate discussions, Mid Sussex will continue to liaise with Crawley on any sites within Mid Sussex that would have cross-boundary impacts particularly any that are promoted to the Council as part of the District Plan Review.</p> <p>Part ix of the policy includes a reference to the delivery of affordable housing at 40% and agreements in relation to the nomination rights for those on the Crawley housing register. There are no mechanisms in place to seek a different affordable housing requirement on sites within Mid Sussex as intended by the policy. The adopted Mid Sussex District Plan requires 30% affordable housing and existing evidence does not demonstrate that the provision of 40% affordable housing is viable in Mid Sussex. Mid Sussex's immediate priority is to meet the affordable housing needs of those who live in Mid Sussex.</p> <p>In this context, this Council <b>objects</b> to the wording of paragraph H3g: Urban Extensions and paragraph 12.76 where it refers to any urban extension on the edge of Crawley and within MSDC should be meeting the unmet needs arising from Crawley.</p> <p><b>Change required:</b> The policy needs significantly redrafting.</p>
REP/066	Mid Sussex District Council	Habitat Regulation Assessment Screening Report	<p>Mid Sussex is concerned about the conclusions reached in the HRA Screening Report and considers that further work is required to ensure that the Plan is <b>sound</b>.</p> <ul style="list-style-type: none"> <li>• Paragraph 4.8-4.9 (air pollution) –New homes and employment are being planned by Crawley Borough Council. The distance of 10km from the borough's boundaries is not a relevant consideration. Mid Sussex Council have undertaken transport modelling, air quality modelling and then ecological interpretation to assess the potential air quality impacts on the Ashdown Forest SAC to support the preparation of the District Plan and Site Allocations DPD.</li> <li>• The 1000 AADT is not the only factor that needs to be taken into account and in any case this needs to be an in-combination assessment (taking account of recent case law as acknowledged).</li> <li>• At paragraphs 5.7 to 5.10 reference is made to the transport modelling undertaken for the Mid Sussex District Plan. This information has been superseded by the Mid Sussex Transport Model (2019) which is a new transport model that has been prepared to support the preparation of the Site Allocations DPD. This new evidence should be taken into account.</li> </ul> <p><b>Suggested Modifications:</b></p> <p><b>Change required:</b> In order to ensure the Plan is sound the Council should prepare the necessary evidence to conclude no adverse impact on the Ashdown Forest SAC habitat. It would be helpful to see some more recent and relevant correspondence from Natural England setting out their view on the likely significant effect on the Ashdown Forest SAC.</p>
REP/066	Mid Sussex District Council	Duty to Cooperate	<p><b>Conclusion</b></p> <p>Mid Sussex is committed to continuous and close co-operation and joint working and welcomes the opportunities to work on an ongoing basis to address unmet development needs and we will use the well-established joint working arrangements in place, to address these outstanding issues.</p>
REP/065	Mole Valley District Council	Duty to Cooperate: Housing	<p>Thank you for your 'Duty to Cooperate' letter dated 21 January 2020 setting out Crawley Borough Council's position in relation to meeting the borough's objectively assessed development needs.</p> <p><b>Housing</b></p>

Ref. No.	Respondent	Policy/ Para	Comments
		H1 SD3	<p>CBC calculates their local housing need to be 752 dwellings per annum using the 'Standard Method' set out in planning practice guidance. This equates to a total housing need of 11,280 dwellings over the lifetime of the 15-year plan (2020-2035). Crawley's Local Plan Review identifies the borough's housing land supply to be 5,355 dwellings over the plan period. This leaves a total unmet need figure of 5,925 net dwellings.</p> <p>MVDC recognise the difficulties in delivering sustainable growth and the challenge of effectively balancing competing environmental, social and economic pressures. Nonetheless MVDC are concerned that CBC will have an unmet need of approximately 5,925 net dwellings over the plan period (2020-2035). Based on the reasoning set out below, it is considered MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing need.</p> <p><b>Housing Market Area</b></p> <p>CBC say there is already a long-established, effective joint working within the Northern West Sussex (NWS) Housing Market Area (HMA). The NWS HMA comprises Crawley, Horsham, Mid Sussex and a small part of Reigate &amp; Banstead local planning authorities and does not include Mole Valley District.</p> <p>Crawley's unmet housing need established from CBC's adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings above their objectively assessed housing needs, mostly to meet the unmet housing need arising from Crawley. CBC says that local plan reviews have acknowledged the 3,150 dwellings figure is likely to change in particular because the 'standard method' for calculating local housing need increases the housing needs in Horsham and Mid Sussex above those established in their respective adopted Plans.</p> <p>MVDC considers that as Mole Valley does not form part of the NWS HMA, the responsibility for meeting Crawley's unmet housing needs, in the first instance, would fall to those local planning authorities within NWS HMA.</p> <p><b>Constraints, Green Belt and demonstrating Exceptional Circumstances</b></p> <p>CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town.</p> <p>Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by landscape and environmental designations, including the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.</p> <p>Mole Valley has published its Draft Local Plan (Future Mole Valley) for consultation between 3 February and 23 March 2020. It is clear from this draft plan MVDC cannot meet its own housing need on brownfield land and/or within the district's existing built-up areas. At this stage, MVDC has not identified any opportunities for part of Mole Valley's housing need to be met by neighbouring local planning authorities. Therefore, having fully explored all other reasonable options for meeting the district's housing need, exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. This is one of the principles which is being considered through MVDC's current Regulation 18 consultation.</p> <p>Paragraph 137c of the NPPF 2019 says that before concluding exceptional circumstances exist to just changes to Green Belt boundaries, MVDC has to demonstrate it has examined fully all other reasonable options for meeting its identified need for</p>

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			<p>development. This will include whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of Mole Valley's identified need for development. Therefore where neighbouring local planning authorities, particularly those in the NWS HMA as they are not constrained by Green Belt boundaries, are capable of meeting their own housing needs then further discussions may be required about whether they could accommodate some of Mole Valley's housing need, to avoid changes to Green Belt boundaries, which both MVDC and the Government attach great importance to<sup>13</sup>. One of the tests for soundness set out in Paragraph 35 of the NPPF 2019 is that plans should be 'positively prepared' in so that the plan provides a strategy which as a minimum seeks to meet the area's objectively assessed needs and is informed by agreements with other authorities so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.</p> <p>The Crawley submission Local Plan does not plan to meet Crawley's local development needs with a total unmet housing need of 5,925 dwellings and unmet employment need of at least 21ha of employment land. At present there is a lack of clarity as to how these unmet needs will be accommodated.</p> <p><b>Suggested Modifications:</b></p> <p>As indicated in MVDC's responses to the Crawley Local Plan consultation and 'duty to cooperate' letter dated 2 March, CBC should consider bringing forward preparation of the AAP for Land North of Crawley to understand the level of development needs that can be accommodated within the AAP boundary.</p> <p>MVDC would consider the Crawley submission Local Plan to be sound subject to agreeing a Statement of Common Ground that addressed the issues set out in the MVDC's responses to the Crawley submission Local Plan consultation and 'duty to cooperate' letter.</p> <p><b>Area Action Plan for Land North of Crawley</b></p> <p>CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for housing, though CBC state housing development would be limited due to aircraft noise contours. CBC would commence work on the AAP after the adoption of the Submission Draft Crawley Local Plan 2035 which is expected in December 2020<sup>14</sup> (notwithstanding the Planning Inspector's recommendations following independent examination of the Local Plan).</p> <p>MVDC supports CBC in seeking to remove the current safeguarding. CBC should consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of housing which can be developed on land within the AAP boundary. It appears that the AAP could potentially contribute towards Crawley's unmet housing need. Without further assessment of land availability in the AAP, it is possible the level of unmet housing need arising from Crawley maybe overstated or non-existent.</p>
REP/ 065	Mole Valley District Council	Duty to Cooperate:	<p><b>Gatwick Airport</b></p> <p>MVDC notes that Policy SD3 signals intent for Crawley Borough Council to produce an Area Action Plan for the land currently safeguarded for a potential second runway at Gatwick Airport. MVDC supports this approach, and will comment on such proposals</p>

<sup>13</sup> As indicated in Paragraph 133 of the NPPF 2019.

<sup>14</sup> CBC's Local Development Scheme 2019 to 2022.

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		Gatwick Airport SD3 GAT1	at the appropriate time. We also note that Policy SD3 safeguards land that corresponds with the Gatwick Airport Masterplan. MVDC has recently published a draft Local Plan for consultation that uses the same updated boundary to safeguard two small parcels of land that fall within Mole Valley District. MVDC welcomes the addition to Policy GAT1 of a reference to Nationally Significant Infrastructure Projects at Gatwick Airport. We agree that point's i-iv must apply to any development proposals at the airport that fall within the scope of the Planning Act 2008.
REP/065	Mole Valley District Council	Duty to Cooperate: Economic Growth EC1	<p><b>Economic growth</b></p> <p>The constrained land supply position in Crawley means there is also an unmet need for employment land of a minimum of 21 hectares over the Plan period according to Crawley's Employment Land Trajectory. The unmet need for employment land has previously been significantly affected by the uncertainty of a possible additional runway at Gatwick Airport and the need to safeguard land for this reason.</p> <p>However, it is now understood that CBC proposes through Policy SD3 to explore the possibility of removing the 'safeguarding' of 613 hectares of land to the north of Crawley, which has been designated for an Area Action Plan (AAP) to meet the future growth and operational needs of the airport alongside other development needs within Crawley, including housing.</p> <p>Although MVDC would support CBC in utilising the land for non-airport uses, the following points should also be taken into consideration:</p> <ul style="list-style-type: none"> <li>- The NWS EGA update 2020 concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). Given that Mole Valley does not form part of the NWS FEMA, MVDC is of the view that the responsibility for meeting Crawley's unmet employment needs, in the first instance, would fall to those local authorities within the NWS FEMA and then subsequently, if necessary, those areas with which influential economic linkages exist, which doesn't include Mole Valley.</li> <li>- The EGA update 2020 also stated that there is potential for a greater level of business growth based on the 'unconstrained' uncapped local housing need figure of 752 dwellings per annum. This can only be planned for if current constraints on land supply are lifted. Using this approach, the EGA identifies an 'unconstrained' employment land requirement of 113ha for Crawley. CBC consider this amount of employment land is likely to be needed should further major urban extensions to Crawley come forward.</li> <li>- Regarding the AAP proposed for the land north of Crawley, it is noted that work on it would commence within three months of the adoption of the Local Plan. CBC should consider bringing its preparation forward to align with the Local Plan Review 2020-2035 in order to determine the amount of housing which can be developed on land within the AAP boundary. It appears that the AAP may be able to contribute towards meeting Crawley's housing need. Therefore, without further assessment of land availability in the AAP, it is possible that the level of unmet housing need arising from Crawley maybe overstated or non-existent.</li> </ul> <p>Furthermore, as has been previously stated within MVDC'S Regulation 18 consultation response, there are significant physical and policy constraints on development in the south eastern part of Mole Valley, adjacent to Crawley, which limit the potential for growth in this area. Transport links between Mole Valley and Crawley are weak, mainly comprising rural lanes with limited capacity. The only A-road connections are the A217 and A264/A24. The A217 reduces to a single carriageway north of the CBC boundary and serves only one small settlement (Hookwood) in Mole Valley before continuing north to Reigate. The A264/24 is far from a direct route; the A264 lying to the south of Crawley and connecting to the A24 some 5km south of Mole Valley's boundary. Public transport connections are also weak, with only limited bus services in the rural parts of southern Mole Valley.</p>

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			Gatwick Airport is a major constraint, both in physical terms and in terms of the consequences of air traffic on the southern part of Mole Valley. The south eastern part of Mole Valley is also significantly impacted by flooding (Flood Zones 2 and 3). For the reasons outlined above, we consider that Mole Valley would be unable to accommodate CBC's unmet employment land needs owing to the identified physical and policy constraints, in conjunction with the limited available employment land within the south eastern part of the District.
REP/065	Mole Valley District Council	H1	<p>Thank you for consulting Mole Valley District Council (MVDC) on Crawley Borough Council's (CBC) Submission draft Local Plan. The strategic issues we wish to comment on are:</p> <ul style="list-style-type: none"> <li>• Meeting housing needs</li> <li>• Economic growth</li> <li>• Gatwick Airport</li> </ul> <p><b>Meeting housing needs</b></p> <p>As set out in our earlier response to CBC (dated 30.08.2019) as part of the Regulation 18 consultation, MVDC does recognise the difficulties in delivering sustainable growth and the challenge of balancing competing environmental, social and economic pressures. We also recognise the physically constrained nature of Crawley. Nonetheless, MVDC are concerned that CBC will have an updated unmet need of approximately 5,925 dwellings over the Plan Period (2020-2035), which has reduced from an unmet need of approximately 6, 475 dwellings at the Regulation 18 stage.</p> <p>Three quarters of Mole Valley is within the Metropolitan Green Belt and is therefore heavily constrained. That includes all of the land adjacent to Crawley. In addition, further constraints include the Area of Outstanding Natural Beauty, a Special Area of Conservation, areas prone to flooding and other environmental constraints. MVDC recently commenced a 7 week public consultation on the draft version of the Future Mole Valley Local Plan (Regulation 18) and based on current assessments it is clear that MVDC cannot meet its own housing need on brownfield land and/or within the districts existing built-up areas. At this stage, MVDC has not identified any opportunities for part of Mole Valley's housing need to be met by neighbouring local planning authorities.</p> <p>Therefore, having fully explored all other reasonable options for meeting the district's housing need, exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. This is one of the principles which is being considered through MVDC's current Regulation 18 consultation.</p> <p>On a further point, Crawley is a functional component of the Northern West Sussex Housing Market Area (NWS HMA), which includes Horsham, Mid Sussex and a small part of the Reigate and Banstead Council areas. Mole Valley does not form part of the same housing market area.</p> <p>On this basis, we do not consider that MVDC should be expected to meet any of CBC's unmet housing need. A separate letter setting out MVDC's position under the Duty to Cooperate (also dated 2 March 2020) reiterates this position.</p>
REP/065	Mole Valley District Council	SD3 EC1	<p><b>Employment</b></p> <p>Joint working across Northern West Sussex (NWS) also resulted in a joint assessment of economic growth. The NWS Economic Growth Assessment (EGA) 2020 update recommends an identified need for a total of 33ha of employment land in Crawley based on the continuation of past development trends which in turn is based on a constrained land supply. However, Crawley's Employment Land Trajectory only identifies a supply of circa 12Ha, resulting in an unmet need of at least 21ha of employment land over the plan period. Furthermore, the EGA update 2020 also said there is potential for a greater level of business growth based on</p>

Ref. No.	Respondent	Policy/ Para	Comments
			<p>the 'unconstrained' local housing need figure of 752 dwellings per annum. Using this approach, the EGA identifies an 'unconstrained' employment land requirement of 113ha for Crawley. CBC consider this amount of employment land is likely to be needed should further major urban extensions to Crawley come forward.</p> <p>It is considered, for the reasons set out below, MVDC is not in a position to be able to assist CBC in meeting its unmet employment needs.</p> <p><b>Functional Economic Market Area</b></p> <p>The NWS EGA update 2020 concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment also identifies that influential economic linkages also exist with Coastal West Sussex, Reigate &amp; Banstead (e.g. Horley) and East Sussex. Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic influences with NWS authorities.</p> <p>MVDC considers that as Mole Valley does not form part of the NWS FEMA, the responsibility for meeting Crawley's unmet employment needs, in the first instance, would fall to those local planning authorities within NWS FEMA and then subsequently, if necessary, those areas with which influential economic linkages exist, which doesn't include Mole Valley.</p> <p><b>Constraints</b></p> <p>CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town.</p> <p>As stated previously, Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by the Surrey Hills Area of Outstanding Natural Beauty (AONB), the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.</p> <p><b>Suggested Modifications:</b></p> <p>Area Action Plan for Land North of Crawley</p> <p>As mentioned previously, CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for economic growth. CBC would commence work on the AAP after the adoption of their new Local Plan and CBC say this work may conclude sites for Strategic Employment Locations can be identified within Crawley should some or all of the land encompassed by the AAP not be required for airport expansion.</p> <p>Given the AAP covers approximately 613ha and the unconstrained employment land need is 113ha, it appears that all of Crawley's employment needs can be met within the Borough with surplus land available within the AAP which can be used to meet other development needs, including housing. MVDC therefore supports CBC in seeking to remove the current safeguarding. CBC should also consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of employment land that can be developed within the AAP boundary.</p>

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REP/ 065	Mole Valley District Council	Duty to Cooperate	<p><b>Summary</b></p> <p>In summary:</p> <ul style="list-style-type: none"> <li>• MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing needs.</li> <li>• MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet employment needs.</li> <li>• MVDC supports the removal of safeguarding land for a potential southern runway at Gatwick Airport and supports the preparation of an AAP setting out the future development of this land to meet development needs arising in Crawley.</li> <li>• CBC should consider bringing forward preparation of the AAP to understand the level of developments needs that can be accommodated within the AAP boundary.</li> </ul>
REP/ 069	Natural England	G11 G12 G13 SDC3	<p>Dear Sir/Madam,</p> <p>Planning consultation: Submission draft Crawley Local Plan (Regulation 19)</p> <p>Thank you for your consultation on the above dated 20 January 2020 which was received by Natural England on 20 January 2020</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has reviewed the Crawley Local Plan Regulation 19 and accompanying appendices together with the Habitats Regulations Assessment (HRA) and Sustainability Appraisal (SA). Please note that we have not provided comments on all policies but those that are within our remit. Natural England has no comment to make on the policies not covered in this response.</p> <p>We are pleased to see the inclusion of many of our previous comments included within the draft submission. In particular comments relating to Green Infrastructure, Biodiversity and Net Gain. We support the inclusion of a "Proposals involving the creation of dwellings will be required to at least meet the Building Regulations optional requirement for tighter water efficiency, and should, where feasible, achieve a more advanced target of 100 litres/person/day. A tighter target of 80 litres/person/day should be met for significant, strategic scale developments." within Policy SDC3 Tackling Water Stress.</p> <p>We agree with the findings in the Sustainability Appraisal and Habitats Regulation Assessment.</p> <p>We have no further comments in relation to this submission.</p>
REP/ 058	Reigate & Banstead Borough Council	Vision para. 2.26	<p><b>Crawley 2035 – Local Plan Review – Regulation 19 Publication, draft Sustainability Appraisal/ Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report</b></p> <p>Thank you for the opportunity to comment on the Regulation 19 Crawley Borough Local Plan 2020-35 (January 2020), draft Sustainability Appraisal / Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report. We have the following comments.</p> <p><b>Housing Needs</b></p> <p>As part of this Regulation 19 Publication RBBC have been asked to formally confirm whether we can meet any of CBC's unmet housing need.</p> <p>Whilst we appreciate the challenges and constraints faced by CBC, we note that the scale of potential unmet housing need in the Regulation 19 Crawley Local Plan is significant. RBBC also faces considerable constraints, including significant extent of Green Belt, AGLV and flooding, which limits our own ability to accommodate growth. The constrained nature of our borough was acknowledged and accepted through Examination of our adopted Core Strategy (2014, reviewed 2019) which recognised that we were unable to fully meet our objectively assessed housing needs in a sustainable manner, giving rise to a shortfall of our own of 2,100-2,700 over our plan period. As such, whilst we are committed to maximising housing supply (as demonstrated through our</p>

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			<p>recent delivery record and housing delivery test score), and to working together to understand how housing needs can be met as fully as possible, we are not in a position to accommodate any of Crawley's identified unmet housing needs. Whilst we appreciate that our Core Strategy recognises that migration between our respective boroughs (and beyond) would continue and be facilitated within the Core Strategy housing requirement of at least 460 dwellings per annum, we would reiterate that there is no specific quantified allowance for Crawley's unmet needs within our adopted housing requirement.</p> <p><b>Suggested Modifications:</b></p> <p>Although there is an allowance within our housing requirement for between 90-130 dwellings to cater for net in-migration into the borough, there is no specific quantified allowance for in-migration from individual boroughs. Notably, the Strategic Housing Market Assessment (SHMA) used to inform our Core Strategy showed that the greatest numbers moving into RBBC were from Greater London and Tandridge, not Crawley. Given this position, to ensure that it is clear for readers that the strategy for meeting Crawley's unmet needs does not include allowances within RBBC's housing requirement, we request that Paragraph 2.27 of CBS's Regulation 19 Local Plan is amended to reflect the fact that there is no specific requirement within our adopted housing requirement to specifically cater for unmet needs within the Crawley / the North West Sussex Housing Market Area. Similarly, in order to be explicit with regards to the strategy to meet Crawley / North West Sussex Housing Market Area unmet housing needs, we also request that Paragraph 2.30 of the Regulation 19 Crawley Borough Local Plan is amended to make it clear that the new neighbourhood level extensions to Horley (the adopted Sustainable Urban Extensions within RBBC's DMP) are to meet RBBC's housing needs and not Crawley / North West Sussex Housing Market Area unmet needs. We also note that Figure 2 below this Paragraph which refers to "Planned Development Adjacent to Crawley" depicts the Horley Strategic Business Park and not the adopted Sustainable Urban Extensions in / around Horley.</p> <p>For reasons of soundness, we request that with regards to housing market areas, that Paragraph 2.26 of the Regulation 19 Crawley Local Plan is amended to accurately reflect only localised links between Horley and the North West Sussex Housing Market Area (and not our borough as a whole). Whilst we accept that there are some very localised linkages between Horley and the North West Sussex authorities, as defined in the 2008 East Surrey SHMA, RBBC forms part of an East Surrey HMA with Elmbridge, Epsom &amp; Ewell, Tandridge and Mole Valley. As drafted, Paragraph 2.26 could be interpreted as suggesting a much greater degree of interaction between our housing market areas than the evidence supports.</p> <p>Notwithstanding our position, more generally we support the strategy of neighbouring authorities accommodating Crawley's unmet need where they can deliver this near to the administrative boundary of Crawley (subject to sites being identified as suitable, sustainability appraisal etc.). We also support the strategy of affordable housing provision in these areas being delivered to meet Crawley's affordable housing needs as otherwise Crawley's unmet affordable housing need (which the SHMA identifies as a substantial 739 dwellings per annum) may remain unmet as Crawley residents may be unable to qualify for affordable housing in adjoining boroughs.</p>
REP/ 058	Reigate & Banstead Borough Council	SD3	<p><b>Safeguarded Land</b></p> <p>We note that the draft submission Local Plan no longer proposes safeguarding land to the north of Crawley and south and east of Gatwick Airport for a potential future second runway. We note that instead Strategic Policy SD3 "North Crawley Area Action Plan" proposes designating this area for the preparation of an Area Action Plan which will commence within three months of the adoption of the Plan. The AAP will assess the needs for future growth and operational needs of the airport alongside other development</p>

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			<p>needs arising in Crawley including economic growth, housing, infrastructure, community/ recreational facilities and any other uses identified through the evidence gathering and consultation on the Area Action Plan.</p> <p><b>Suggested Modifications:</b>            Whilst we understand that this is being proposed as CBC does not consider that there is, at this time, robust evidence within the draft Aviation Strategy, Aviation 2050, to continue the safeguarding of the land and that continual safeguarding is restricting the provision of land to meet economic, housing, infrastructure, community/ recreation and other needs, we have historically tentatively supported maintaining the safeguarded land in order to provide future flexibility for airport expansion (please note however that this should not be interpreted as Council support for a new southern runway).</p>
Rep/0 58	Reigate & Banstead Borough Council	EC2	<p><b>Economic Needs</b>            We welcome the amendment requested at Regulation 18 stage to proposed Policy EC1 “Sustainable Economic Growth” which removes the hierarchy for delivering new strategic employment land. We remain committed to joint working on strategic employment needs, but this amendment removes potential uncertainty for residents living within RBBC.            We support in broad terms of the commitment in proposed Policies EC1 “Sustainable Economic Growth” and EC2 “Economic Growth in Main Employment Areas” to make best use of and intensify existing employment areas. We note that the intention of these policies is in line with our DMP Policies EMP1 “Principal Employment Areas”, EMP2 “Local Employment Areas” and EMP4 “Safeguarding Employment Land and Premises”.</p> <p>Thank you for the opportunity to comment earlier on a previous draft version of the Northern West Sussex Economic Growth Assessment Update as part of duty to co-operate discussions. We note that the study has identified a need for -1.1ha employment needs (baseline job growth scenario), 33.0ha past development rates scenario) and 113.0ha (baseline labour supply scenario) and that Lichfields (Paragraph 8.74 North West Sussex Economic Growth Assessment Update) considers that for Crawley “the baseline job growth scenario does not appear to provide a robust scenario for positively planning for future employment space” and “that the Council [should] consider planning to accommodate the past take-up based requirement as a minimum, to enable historically strong levels of employment development to continue in the Borough over the new plan period”.</p> <p>The Regulation 19 Crawley Borough Local Plan therefore seeks as a minimum to provide employment needs in line with the past development rates scenario. When subtracting the available land supply pipeline, it is stated that this gives an outstanding business land need of 21ha. This outstanding business land need however does not take into account any employment needs that are proposed to be met on the Horley Strategic Employment Site, Policy HOR9 of RBBC’s Development Management Plan. In addition to helping to meet RBBC’s strategic office needs, the Horley Strategic Business Park was also allocated to help meet CBC’s unmet strategic office needs. Taking into consideration the 45,513sqm of CBC’s unmet strategic office needs proposed to be accommodated on the Horley Strategic Employment Site, we consider that there is no unmet need for office accommodation (surplus of 62,524sqm baseline job growth scenario; surplus of 69,884sqm past development rates scenario; and surplus of 40,279sqm labour supply scenario).</p> <p>In relation to potential unmet need for industrial, manufacturing and distribution accommodation, given our policy position (i.e. an up-to-date Local Plan) we can confirm that we are not able to assist in meeting this unmet need. We note that one option proposed to meet the identified unmet manufacturing and distribution needs arising in the Crawley is to assess the future growth needs of the airport for the safeguarded land to the north of Crawley and to the south and east of Gatwick Airport, and to determine whether the future growth needs of the airport require any, or all of the land. If not, it is proposed that a sustainable site/s within the area will be</p>

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			designated to accommodate strategic employment needs based on Crawley's unconstrained business land requirements. Should this land be designated for employment needs, to ensure the approach is justified / effective, we consider that this provision should be focussed to meeting Crawley's unmet strategic manufacturing, industrial and distribution uses.
REP/ 058	Reigate & Banstead Borough Council	GAT1	<p><b>GAT1 "Development of the Airport with a Single Runway"</b> We consider that the overarching strategy proposed in Policy GAT1 is sound. It is in line with the strategy in our Core Strategy (Policy CS9 "Gatwick Airport") which the Core Strategy Inspector considered sound.</p> <p><b>Suggested Modifications:</b> We agree that, as set out in proposed Policy GAT1 and Paragraphs 10.12 and 10.13, it is important that any future growth minimises the impacts of operation of the airport on the local environment and surrounding residents and that any future growth is supported by appropriate infrastructure and maximum benefits across surrounding authorities. In line with our own Core Strategy policy, we would therefore welcome reference in Policy GAT1 to the importance of joint working with neighbouring authorities and partners across the Gatwick Diamond through existing mechanisms such as Gatwick Officers Group to ensure that these shared strategic objectives are achieved for all.</p>
REP/ 058	Reigate & Banstead Borough Council	GAT2	<p><b>GAT2 "Gatwick Airport Related Parking"</b> We strongly support the approach set out in this policy and consider that the proposed approach is sound. The proposed policy is aligned with our adopted DMP Policy TAP2 "Airport Car Parking" which our DMP Inspector considered sound, and reflects the long-standing, cross-boundary approach to the management of parking associated with the airport.</p>
REP/ 058	Reigate & Banstead Borough Council	GAT3	<p><b>GAT3 "Employment Uses at Gatwick"</b> We strongly support the approach outlined in proposed Policy GAT3 and welcome the recognition within this policy and the supporting text of the importance of demonstration that new non-airport related commercial floorspace within the airport boundary will only be permitted where it can be demonstrated that it will not have an unacceptable impact on the role and function of town centres and employment areas beyond Crawley's boundaries. We consider that this approach is sound and in accordance with the sequential test for main town centre uses, seeking to ensure that the role of town centres and employment areas is not impacted by non-essential airport related office provision at Gatwick Airport.</p>
REP/ 058	Reigate & Banstead Borough Council	TC5	<p><b>Retail and Town Centres</b> We support and consider that the town centre first approach proposed in Policy TC5 "Town Centre First" is sound. We note that it is consistent with national policy and the approach set out in our DMP (Policy RET5 "Development of Town Centre Uses Outside Town and Local Centres"). We note that for retail and town centre policies to be found sound, Paragraph 85 of the revised NPPF requires planning policies to define a network and hierarchy of town centres. This is defined in Paragraph 11.28 of the Regulation 19 Crawley Borough Local Plan<sup>15</sup>. We would welcome / question whether there is a need for greater clarity with regards to the policy position of neighbourhood centres. Paragraph 11.28 appears to suggest that neighbourhood centres will be treated as out-of-centre sites, however, criterion (b) of Strategic Policy TC5 "Town Centre First" appears to suggest that neighbourhood parades will be given the same policy</p>

<sup>15</sup> "For the purposes of policy interpretation, for retail uses Town Centre sites are defined as those locations falling within the Primary Shopping Area as identified on the Local Plan Map. Sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, are defined as edge-of-centre sites and these are the next most sequentially preferable sites. All locations beyond the Town Centre Boundary, in retail terms, represent out-of-centre locations".

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			<p>weight as town centres. We note that the revised NPPF excludes neighbourhood parades from the town centre definition, but question whether in a Crawley context neighbourhood centres are considered as town centres and that the use of the word reflects the historic new town designation.</p> <p>If neighbourhood centres within Crawley are not given the same policy position as town centres, to be in accordance with the revised NPPF “town centre first” approach, we consider that there is a need to amend Strategic Policy TC5 to ensure that centres within other authorities in the retail catchment of proposals (for example town centres in RBBC) are given the same policy position as town centres in CBC.</p> <p><b>Suggested Modifications:</b></p> <p>We also question whether Strategic Policy TC5 criterion (b) should be amended – in accordance with Paragraph 89 of the revised NPPF – to take into consideration the impact on local consumer choice and trade as part of the impact on town centre vitality and viability. Whilst we note that Paragraph 11.35 advises that the retail impact assessment should take into consideration forecast trade draw, given the decision in <i>Cherkley Campaign Ltd, R (on the application of) v Mole Valley District Council and Anor [2014]</i> confirmed that the supporting text to a policy does not have the same weight as policy, we suggest that this requirement would be better included within the policy.</p> <p>Similarly, we note that a retail impact threshold of 500sqm is proposed in Paragraph 11.34. We welcome and support the introduction of a lower retail impact threshold than the national standard to support / protect town centres and note that our adopted DMP includes a retail impact assessment threshold of 150sqm for comparison retail and 250sqm for convenience retail. Given the above appeal decision we suggest that this requirement would be better included in a policy rather than the supporting text.</p>
REP/ 058	Reigate & Banstead Borough Council	H8	<p><b>Gypsies, Travellers and Travelling Showpeople</b></p> <p>RBBC note that CBC is currently in the process of updating its 2014 Gypsy &amp; Traveller Needs Assessment. We note that the current, 2014, Gypsy, Traveller and Travelling Showpeople Assessment identifies a potential need for up to 10 pitches and that this is the need that is currently being planned for in the Regulation 19 Crawley Borough Local Plan. We suggest that you may wish to consider the soundness of a proposed submission Local Plan policy “reserve” allocation, based on outdated evidence.</p> <p>We note that the 2014 study sought to meet the needs of the Gypsies, Travellers and Travelling Showpeople as defined in the National Planning Policy for Traveller Sites. The current National policy is from August 2015, postdating CBC’s current evidence on G&amp;T housing needs. Our DMP makes provision to meet the needs of households who meet the National Planning Policy definition of “Traveller”, and also those who meet the wider equalities definition, and those for whom it was unclear. We would therefore urge CBC to also seek to meet the needs of both definitions in order to ensure that the needs of this wider group are properly planned for in accordance with the public sector equalities responsibility.</p> <p>Should the updated G&amp;T needs assessment study identify a greater need for Gypsy, Traveller and Travelling Showpeople than that currently being planned for, in order for the plan to be “justified” based on an appropriate strategy, and therefore sound, further sites may need to be identified to meet this updated need, a process which would require Main Modifications to be made to the proposed submission plan.</p> <p>Whilst we note that proposed Policy H8 “Gypsy, Traveller and Travelling Showpeople Sites” allows windfall sites to come forward, subject to a criteria based approach, opportunities in the borough may be few given the land constraints and high land values.</p>

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			We appreciate the land constraints within CBC, however, we would like to reiterate that whilst our DMP has sought to meet our pitch and plot needs through site-specific allocations and as part of wider housing/ employment/ community development on our Sustainable Urban Extensions, there is no surplus available to accommodate any potential unmet needs from CBC.
REP/ 058	Reigate & Banstead Borough Council	Housing Trajectory	<p><b>Housing Trajectory</b></p> <p>We note that the Housing Trajectory includes a windfall allowance of 55 dwellings per annum for each year of the plan period. Whilst we recognise that this is the same provision as that currently included within Crawley's Local Plan (2015-2030), taking into consideration the tests of soundness, we question whether this windfall allowance is justified. Paragraph 70 of the revised NPPF states that "where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply" and that "any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends". We note that no evidence has been provided as to whether the current windfall allowance continues to be an appropriate level going forward (no evidence for example has been provided on previous levels of windfall delivery).</p> <p><b>Suggested Modifications:</b></p> <p>In relation to windfalls we also note that the January 2020 Strategic Housing Land Availability Assessment (SHLAA) identifies three potential sites as coming forward as windfalls: 46-48 Goffs Park Road; 102-112 London Road and 2-4 Tushmore Lane; and 116-136 London Road. We consider that these sites should all be excluded from any windfall allowance: the latter two are identified as not currently available due to multiple landownership and the former is already included within the trajectory as an identified site to come forward within the plan period (we also question whether it should be included in the trajectory as it has uncertain landownership).</p> <p>We also note that the Housing Trajectory includes a number of deliverable and developable "suitable SHLAA sites". We note that a number of the developable sites (such as Rear Gardens Dingle Close/ Ifield Road and Rear Gardens Snell Hatch/ Ifield Road) are included in the trajectory despite not being promoted for housing development. We question therefore, whether in line with the NPPF glossary, there is a reasonable prospect that these sites will become available for development at the point envisaged. Whilst we appreciate the importance of identifying suitable sites as part of the SHLAA, we question whether they should be included in the trajectory as deliverable / developable sites and whether instead they should be treated as windfall sites.</p>
REP/ 058	Reigate & Banstead Borough Council	Evidence	<p><b>Outstanding Evidence</b></p> <p>We appreciate the need for swift adoption of the Local Plan Review to ensure that Crawley Borough Council (CBC) retains an up-to-date Local Plan in accordance with Paragraph 33 of the revised National Planning Policy Framework (NPPF). However, we think that it may be prudent to consider completion of further evidence before finalising and submitting the draft Local Plan for examination.</p> <p>The Town and Country Planning (Local Planning) (England) Regulations 2012 ("the Regulations"), require at Regulation 19 Publication a copy of each of the "proposed submission documents" (and a statement of the representations procedure) to be made available in accordance with Regulation 35 of the Regulations.</p> <p>As part of this publication, we have been invited to consider whether the Local Plan complies with legal requirements, the duty to co-operate and is sound. For reasons of legal compliance, we are concerned that there are a number of key pieces of evidence that are key to assessing needs within the borough and identifying an appropriate strategy to meet the identified needs, that we would expect to be included as "proposed submission documents" to inform the Plan review which have not been made available. These</p>

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			include Plan viability; transport modelling; open space, sport and recreation; heritage; Gatwick sub-region Water Cycle Study and Strategic Flood Risk Assessment; and Gypsy and Traveller Needs Assessment. Given that these studies have not been made available, we and other specific and general consultees will not have had an opportunity to consider these evidence documents (save the Gatwick Water Cycle Study which we are jointly commissioning), nor how their findings may justify the strategy in the Plan to be submitted. Part of the test of soundness (NPPF Paragraph 35) is for the Plan's strategy to be based on proportionate evidence.
REP/ 058	Reigate & Banstead Borough Council	Duty to Co-operate	<p><b>Legal Compliance and Duty to Co-Operate</b></p> <p>Section 33A of the Planning and Compulsory Purchase Act 2004 places a duty upon local authorities and other prescribed bodies to co-operate on strategic matters that cross administrative boundaries. In order to demonstrate compliance with duty to co-operate, Paragraph 27 of the revised NPPF states that "strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these". It advises that "these should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan-making process to provide transparency". Compliance with national policy, which includes the NPPF, is part of the test of soundness of a Local Plan.</p> <p>As part of the Regulation 19 publication we note that no statements of common ground have been produced, and this Council has not been approached yet by CBC to produce one. This is contrary to Paragraph 020 Reference ID: 61-020-20190315 of the national planning practice guidance (PPG) which specifically advises that "authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated".</p> <p>It also leads to questions regarding the soundness of the plan proposed. Paragraph 35 of the revised NPPF which outlines the tests of soundness states that for plans to be "positively prepared", plans should provide a strategy which is informed by agreements with other authorities and that in order for plans to be "effective" they should be based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.</p> <p>Without statement of common ground(s) it is difficult to understand what the strategy will be to meet unmet needs in the borough, which again raises questions of soundness.</p>
REP/ 058	Reigate & Banstead Borough Council	Plan Period	<p><b>Strategic Policies</b></p> <p>We note that from the table on page 10 of the Regulation 19 Crawley Borough Local Plan that adoption is anticipated for December 2020. Paragraph 22 of the revised NPPF advises that "strategic policies should look ahead over a minimum 15-year period from adoption (except in relation to town centre development), to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure". Should the anticipated adoption slightly slip, the strategic policies in the plan will not look ahead over the minimum 15-year period.</p>
REP/ 058	Reigate & Banstead borough Council	SA/SEA	<p><b>Draft Sustainability Appraisal/ Strategic Environmental Assessment</b></p> <p>We note that given that the Regulation 19 Crawley Borough Local Plan is largely a review of the current Crawley Local Plan, CBC have sought largely to only review the previous SA / SEA conclusions, update where changes are proposed, and where new options are proposed consider these. We recognise that the only policy that identified a potential negative impact is GAT2 "Gatwick Airport Related Parking". As stated previously in this response, this policy is in line with Policy TAP2 "Airport Car Parking" in our</p>

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			<p>adopted DMP and we support this approach and consider that it is sound as it reflects the historic and cross-boundary policy position to meet airport car parking needs.</p> <p>More generally we have the following comments:</p> <p><i>Measurability of criteria/ objectives:</i> Whilst we appreciate that this is only a review of the current SA/ SEA, from reading the document there appears to be limited specificity with regards to the criteria and objectives used to assess the options.</p> <p><i>Evidence:</i> It is recognised that a number of evidence studies are still being finalised, the findings of these studies will need to be taken into consideration in an update to the SA/ SEA.</p> <p><i>Paragraph 3.7:</i> Incorrectly states that CBC has a 9.59 year land supply position, the Housing Trajectory produced to accompany the consultation identifies a land supply position of 5.80 years.</p> <p><i>Paragraph A32:</i> We question whether this paragraph should be amended to reflect the fact that as local authorities we work together to measure/ monitor/ mitigate air quality issues.</p> <p><i>Paragraph C11:</i> We note that the mix identified for affordable housing is different to that identified in Paragraph 13.14 of the Regulation 19 Crawley Borough Local Plan.</p> <p><i>Paragraph C11:</i> We note that only 0.5% of 4-bedroom properties have been delivered despite a need for 5%/5-10%. We are currently in the process of preparing a Affordable Housing SPD, as part of this our Housing Services Team suggested that we should require 3-bedroom accommodation to be provided as 3b6p accommodation not 3b5p as some of the need for 4-bedroom properties is due to families with three children not being able to be housed in 3b5p houses.</p> <p><i>Paragraph D5:</i> Recognises that “the allocated Horley Business Park in RBBC will help to meet some of Crawley’s unmet business land needs”, this however isn’t reflected in the economic growth options.</p> <p><i>Policy H5: Affordable Housing:</i> We note that Option 4 “40% affordable housing with no threshold” has been identified as the “chosen option”. Whilst we recognise the need for affordable housing, we note that this is contrary to national policy which states that “the provision of affordable housing should not be sought for residential developments that are not major developments” (Paragraph 63 revised NPPF). Major developments are defined in the revised NPPF as sites “where 10 or more homes will be provided, or the site has an area of 0.5hectares or more”.</p> <p>We note that the options include only the provision of either 30% or 40% affordable housing with/out a threshold. No rationale for these options is provided. The 40% threshold is a continuation of the current Local Plan policy. No testing of a higher percentage requirement/ rationale for not including a higher percentage threshold.</p> <p><i>Policy H1: Housing Provision:</i> It is noted that five options were tested:</p> <ul style="list-style-type: none"> <li>• Option 1: Housing requirement of 1,848dpa based on identified affordable housing need of 739dpa (i.e. total housing required to meet need on basis of 40% affordable housing provision)</li> <li>• Option 2: Housing requirement based on Government’s standard method for calculating housing need, excluding the cap (752dpa)</li> <li>• Option 3: Housing requirement based on Government’s standard method for calculating housing need, including the cap (476dpa)</li> <li>• Option 4: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15)</li> <li>• Option 5: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15) with ‘unmet need’ expressed. and that Option 4 was identified as the “chosen option”.</li> </ul>

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			<p>Following our comments on the affordable housing appraisal, we note that no options were considered to deliver the full amount of affordable housing with a different percentage requirement.</p> <p>More generally we note that some of the commentary is quite general/ includes untested statements such as for Option 1 “housing delivery at this level would be well beyond what has been achieved in recent years, suggesting that market factors and the capacity of the construction industry are likely to prevent delivery at this level, which would involve excess provision of market housing ... kit is also a level unlikely to be met or sustained by the housing industry (with annual delivery levels traditionally averaging around a quarter to a third of this)”.</p>
REP/ 058	Reigate & Banstead Borough Council	Habitats Regulations Assessment Screening Report	<p><b>Habitats Regulations Assessment Screening Report</b></p> <p>RBBC recognises that for the 2015 Local Plan, evidence was gathered to demonstrate that the possible effects of the local plan would not have a significant impact either on their own or “in-combination” with other plans on the three European Sites within 15km of CBC. We understand that due to the findings of the Lewes and South Downs Joint Core Strategy 2017 Legal Challenge in relation to how “in-combination” effects are considered that CBC will do further work to understand the possible impacts on the European sites arising from the Regulation 19 Crawley Borough Local Plan and “in-combination” with other plans.</p> <p>We hope that you find these comments helpful. Should you have any queries, please do not hesitate to contact us. We are very happy to discuss any of the points raised above in more detail.</p> <p><b>Suggested Modifications:</b></p> <p>We suggest that when considering the findings of the 2015 Habitats Regulations Assessment Screening Report, consideration is given to the ‘People over Wind’ judgement<sup>16</sup> which clarified that when making screening decisions for the purposes of deciding whether an Appropriate Assessment is required, competent authorities cannot take into account any mitigation measures.</p> <p>We note that Paragraph 5.6 states that “the following authorities have considered/ are considering the Habitat Regulation Assessment requirements as part of their plan-making processes in light of the legal judgement in relation to the “in-combination” effects ...” As part of the preparation/ examination of our DMP, we also took into consideration “in-combination” effects. We then undertook an Appropriate Assessment which included consideration of the potential changes in air quality from the “in-combination” effects on predicted traffic. It then assessed mitigation measures to protect the foraging habitat referred to as a ‘functional linkage’ of Bechstein’s bats surrounding the Mole Gap to Reigate Escarpment SAC. The Appropriate Assessment concluded that the DMP would not result in any adverse effect on the integrity of any European designated site within 15km of the borough boundary either alone or “in-combination” with other local authorities.</p>
REP/ 029	Sport England	SD2	<p>Sport England supports this policy and references to Active Design and the Essex Design Guide in respect of major development being required to consider the 10 principles of Active Design.</p> <p><b>Suggested Modifications:</b></p> <p>Sport England suggests that the checklist contained at Appendix A of the Active Design Guidance is referred to in the text at para 3.16 as a means of applicants being able to demonstrate that they have met this requirement.</p>
REP/ 029	Sport England	SD3	<p>There is an Artificial Grass Pitch in the north east corner of the large car park area to the east of the runway. The retention of this and any other land or building in sport or recreation use should be assessed against para 97 of the NPPF and not ‘balanced’ against other uses.</p>

<sup>16</sup> Case C-323/17 People Over Wind and Peter Sweetman v Coillte Teoranta (‘People Over Wind’)

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			<p><b>Suggested Modifications:</b> The policy should say that assessment of land and buildings in sport and recreation use will be against para 97 of the NPPF.</p>
REP/029	Sport England	Planning Obligations Annex OS2	<p>Should be made clearer that the third paragraph (financial contributions towards enhancement of existing facilities for increased demand) is not appropriate where paragraph 2 applies in respect of playing fields as it is not in accord with para 97 of the NPPF or Sport England's playing field policy</p> <p><b>Suggested Modifications:</b> Clarification of this is required. Existing playing fields and pitches unless demonstrated to be surplus to requirements through the evidence base (PPS) are to be replaced with equivalent or better provision in terms of quantity and quality and in a suitable location.</p>
REP/037	Southern Water	SDC3	<p>As the statutory water undertaker for a large proportion of Crawley Borough, Southern Water supports the Council's higher water efficiency target of 100 litres/person/day and 80 litres/person/day for significant strategic development. Southern Water also supports the requirement for non-residential buildings to meet the minimum standards for BREEAM 'Excellent' within the Water category, since a comprehensive approach to water efficiency standards in all new development should be adopted in order to achieve meaningful savings.</p> <p>Whilst knowledge and research around climate change and its predicted impacts is constantly evolving, in tandem with this is an ongoing requirement to increase water supplies to meet the needs of a growing population. Higher standards of water efficiency in new development can support greater long term sustainability – with the potential to delay or reduce the need to increase abstraction or find new sources of water supply, which in turn will help to minimise impacts on the environment. This approach is endorsed through Southern Water's Water Resource Management Plan 2020-2070.</p> <p><b>Suggested Modifications:</b> This policy is sound as it meets the requirement of the NPPF paragraph 149 for local plans to seek to mitigate and adapt to climate change and its long term implications for water supply, therefore no modifications are sought.</p>
REP/059	Surrey County Council	DD1 H3d H3e	<p><b>Draft Crawley Borough Local Plan 2020 – 2035 January 2020 Submission Publication Consultation: January – March 2020</b></p> <p>Thank you for consulting Surrey County Council (SCC) on the Crawley Local Plan Review 2020 – 2035 Submission Consultation. We previously responded, by letter, dated 11 September, to the consultation on the Regulation 18 Local Plan Review. Our earlier comments related to highways, heritage and early years. We have no further issues to raise on these matters. Our officer response to the current consultation relates to our role as the Mineral and Waste Authority for Surrey and our comments are set out below. We consider that the Crawley Local Plan is legally compliant, sound and compliant with the duty to co-operate, but wish to emphasise the importance of maintaining the policy wording set out below.</p> <p><b>Suggested Modifications:</b> As Surrey's landfill capacity is limited, we support the requirement, included within policies DD1, H3d and H3e, for waste and recycling storage to be designed into new housing development schemes. These measures will minimise waste by ensuring that it is managed at the highest practical point on the waste hierarchy. For this reason, we suggest minor modifications to policies DD1, H3d and H3e, to include a requirement for the sustainable management of construction, demolition, and excavation waste. These modifications would be in accordance with West Sussex Waste Local Plan Policy W23: 'Waste Management within New Development'.</p>

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REP/ 059	Surrey County Council	H2	We welcome the requirement, in Policy HS2: Key Housing Sites, for development on the Tinsley Lane site to be designed to minimise potential future conflicts with the function of the adjacent Crawley Goods Yard safeguarded minerals site. The continued operation of this facility will help to ensure that Surrey is supplied with necessary construction aggregates.
			<p><b>Suggested Modifications:</b></p> <p>We support the requirement, in Policy HS2: Key Housing Sites, for development on the Tinsley Lane site to be designed to minimise potential future conflicts with the function of the adjacent Crawley Goods Yard safeguarded minerals site. The continued operation of this facility will help to ensure that London and the South East is supplied with necessary construction aggregates.</p>
REP/ 052	Tandridge District Council	SD3	<p>Thank you for giving us the opportunity to comment on your Draft Crawley Borough Local Plan 2020-2035. We have the following comments to make.</p> <p>It is noted that against the Standard Methodology you have a housing need of 11, 280 (752 dpa) but that the draft Local Plan is proposing provision of 5,355 dwellings, with the majority provided in the first 5 years of the Local Plan through Forge Wood and the Town Centre. However, it is noted that there remains an unmet need of 5,925 over the plan period and that Crawley will be looking to the adjoining authorities to help meet this need, albeit primarily those within the same HMA, which Tandridge does not fall within. Similar to Crawley, Tandridge is also a heavily constrained district and given those constraints it is unable to meet its identified need. Our Spatial Strategy proposes 6,056 dwellings to 2033, leaving us with an unmet need of 3, 344. Our Local Plan 2013-2033, which is being assessed against the NPPF 2012, is currently going through the examination process and we are waiting on the Inspector's response following the hearings last year.</p> <p>Tandridge notes that the draft Local Plan proposes a North Crawley Area Action Plan, which will assess the land between Gatwick Airport and the town to determine the most appropriate use of the land. This will include consideration of the future growth and operational needs of the airport and the development needs of Crawley, including economic and housing development needs. It is understood that this work could conclude that this land still needs to be safeguarded but also that it may conclude that some land is available to meet housing and/or employment need. However, it is understood that the first step will be to understand the expansion needs of the airport, followed by an understanding of noise contours to be applied in the future, and the need to create an access. Some of this land abuts our administrative area and as such there could be implications for our residents and our infrastructure. We already have concerns about the significant growth in the use of Gatwick Airport and its associated surface access arrangements and the consequential impact on our highway infrastructure. We also have concerns that the development of the North Crawley Area Action Plan area could have significant implications for the highway network within our district. In terms of transport modelling we would expect that regard is had to the cumulative impact of proposed development within nearby authority areas, including our proposed Garden Community at South Godstone and our proposed site allocations, particularly around Smallfield. We would also recommend that your Highway Authority works together with Surrey County Council, as our County Highway Authority, in order to ensure the impact is adequately assessed.</p> <p>We therefore have concerns about the impact upon infrastructure, primarily around transport, but including such things as the treatment of waste water. As such Tandridge would like to be involved in any future consultations in relation to the Local Plan and the proposed AAP.</p>
REP/ 005	Thames Water	DD4 DD5	We support the reference to taking account of existing sewerage and water infrastructure when planting trees. Thames Water recognises the environmental benefits of trees and encourages the planting of them. However, the indiscriminate planting of trees and shrubs can cause serious damage to the public sewerage system and water supply infrastructure. In order for the public

Ref. No.	Respondent	Policy/ Para	Comments
	Utilities Limited		sewers and water supply network to operate satisfactorily, trees, and shrubs should not be planted over the route of the sewers or water pipes.
REP/005	Thames Water Utilities Limited	IN1	<p>As you will be aware, Thames Water are the statutory sewerage undertaker for the Borough. We support Policy IN1 and paragraph 8.10 in principle, but consider that there should be specific mention in the Policy to wastewater/sewerage infrastructure, similar to the separate policy IN3 on telecommunications. Thames Water seeks to co-operate and maintain a good working relationship with local planning authorities in its area and to provide the support they need with regards to the provision of water supply and sewerage/wastewater treatment infrastructure. Water and wastewater infrastructure is essential to any development. Failure to ensure that any required upgrades to the infrastructure network are delivered alongside development could result in adverse impacts in the form of internal and external sewer flooding and pollution of land and water courses and/or low water pressure. A key sustainability objective for the preparation of Local Plans and Neighbourhood Plans should be for new development to be co-ordinated with the infrastructure it demands and to take into account the capacity of existing infrastructure. Paragraph 20 of the revised National Planning Policy Framework (NPPF), February 2019, states: "Strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for... infrastructure for waste management, water supply, wastewater..."</p> <p>Paragraph 28 relates to non-strategic policies and states: "Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure..."</p> <p>Paragraph 26 of the revised NPPF goes on to state: "Effective and on-going joint working between strategic policy-making authorities and relevant bodies is integral to the production of a positively prepared and justified strategy. In particular, joint working should help to determine where additional infrastructure is necessary..."</p> <p>The web based National Planning Practice Guidance (NPPG) includes a section on 'water supply, wastewater and water quality' and sets out that Local Plans should be the focus for ensuring that investment plans of water and sewerage/wastewater companies align with development needs. The introduction to this section also sets out that "Adequate water and wastewater infrastructure is needed to support sustainable development" (Paragraph: 001, Reference ID: 34-001-20140306).</p> <p><b>Suggested Modifications:</b></p> <p>Addition to Policy IN1: "The Local Planning Authority will seek to ensure that there is adequate water and wastewater/sewerage infrastructure to serve all new developments. Developers are encouraged to contact the water/waste water company as early as possible to discuss their development proposals and intended delivery programme to assist with identifying any potential water and wastewater network reinforcement requirements. Where there is a capacity constraint the Local Planning Authority will, where appropriate, apply phasing conditions to any approval to ensure that any necessary infrastructure upgrades are delivered ahead of the occupation of the relevant phase of development."</p> <p>It would also be helpful to amend the supporting paragraph 8.10 to refer to the Thames Water free Pre-Planning service which confirms if capacity exists to serve the development or if upgrades are required for potable water, waste water and surface water requirements. Details on Thames Water's free pre planning service are available at: <a href="https://www.thameswater.co.uk/preplanning">https://www.thameswater.co.uk/preplanning</a></p>

Ref. No.	Respondent	Policy/ Para	Comments
REP/005	Thames Water Utilities Limited	IN2	<p>Local Plans should consider the requirements of the water companies for land to enable them to meet the demands that will be placed upon them as recognised in paragraph 8.10 This is necessary because it will not be possible to identify all the water and wastewater/sewerage infrastructure required over the plan period due to the way water companies are regulated and plan in 5 year periods (AMPs). Thames Water are currently in the AMP6 period which runs from 1st April 2015 to 31st March 2020 and does not therefore cover the whole Local Plan period. AMP7 will cover the period from 1st April 2020 to 31st March 2025.</p> <p><b>Suggested Modifications:</b>            Addition to Policy IN2: “The development or expansion of waste water facilities will normally be permitted, either where needed to serve existing or proposed development in accordance with the provisions of the Development Plan, or in the interests of long term waste water management, provided that the need for such facilities outweighs any adverse land use or environmental impact that any such adverse impact is minimised.”</p>
REP/005	Thames Water Utilities Limited	GAT1	<p>We support the deletion the Gatwick Airport Safeguarded Land policy. The previous safeguarded area includes Thames Water’s Crawley Sewage Works and therefore provided uncertainty in relation to future upgrades at the sewage works. There are currently no approved plans for an additional runway at Gatwick Airport and this does not form part of the Government’s Aviation Strategy and therefore we agree the safeguarding should be removed. Where any proposed development is within 800m of Crawley Sewage Works, the developer or local authority should liaise with Thames Water to consider whether an odour impact assessment is required as part of the promotion of the site and potential planning application submission. The odour impact assessment would determine whether the proposed development would result in adverse amenity impact for new occupiers, as those new occupiers would be located in closer proximity to a sewage treatment works. Paragraph 170 of the NPPF, February 2019, sets out that: “Planning policies and decisions should contribute to and enhance the natural and local environment by: ...e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality, taking into account relevant information such as river basin management plans...” Paragraph 180 goes on to state: “Planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development....” The odour impact study would establish whether new resident’s amenity will be adversely affected by the sewage works and it would set the evidence to establish an appropriate amenity buffer. On this basis, text similar to the following should be incorporated into the Neighbourhood Plan: “When considering sensitive development, such as residential uses, close to the Sewage Treatment Works, a technical assessment should be undertaken by the developer or by the Council. The technical assessment should be undertaken in consultation with Thames Water. The technical assessment should confirm that either: (a) there is no adverse amenity impact on future occupiers of the proposed development or; (b) the development can be conditioned and mitigated to ensure that any potential for adverse amenity impact is avoided.”</p> <p><b>Suggested Modifications:</b>            Need to take account of potential odour from Crawley Sewage Works in relation to any odour sensitive development proposals within 800m.</p>

Ref. No.	Respondent	Policy/ Para	Comments
REP/005	Thames Water Utilities Limited	H2	<p>The information contained within the new Local Plan will be of significant value to Thames Water as we prepare for the provision of future infrastructure.</p> <p>The attached table provides Thames Water's site specific comments from desktop assessments on sewerage/waste water network and waste water treatment infrastructure in relation to the proposed sites. We are also engaged in the Gatwick water cycle study. More detailed comments will follow / supersede these in the Gatwick water cycle study.</p> <p>Early engagement between the developers and Thames Water would be beneficial to understand:</p> <ul style="list-style-type: none"> <li>•What drainage requirements are required on and off site</li> <li>•Clarity on what loading/flow from the development is anticipated</li> </ul> <p>As recognised at Paragraph 8.10 of the draft Local Plan, it should be noted that in the event of an upgrade to our sewerage network assets being required, up to three years lead in time is usual to enable for the planning and delivery of the upgrade. As a developer has the automatic right to connect to our sewer network under the Water Industry Act we may also request a drainage planning condition if a network upgrade is required to ensure the infrastructure is in place ahead of occupation of the development. This will avoid adverse environmental impacts such as sewer flooding and / or water pollution. Waste-water/Sewage Treatment Works upgrades take longer to design and build. Implementing new technologies and the construction of a major treatment works extension or new treatment works could take up to ten years to plan, design, obtain approvals and build. (See attached excel spreadsheet).</p> <p><b>Suggested Modifications:</b> Need to make reference to any site specific sewerage/wastewater infrastructure concerns.</p>
REP/005	Thames Water Utilities Limited	EP1	<p>We support Policy EP1 part iv) in particular as this is in line with our previous representations.</p> <p>With regard to surface water drainage it is the responsibility of the developer to make proper provision for drainage to ground, watercourses or surface water sewer. It is important to reduce the quantity of surface water entering the sewerage system in order to maximise the capacity for foul sewage to reduce the risk of sewer flooding.</p> <p>Limiting the opportunity for surface water entering the foul and combined sewer networks is of critical importance to Thames Water. Thames Water have advocated an approach to SuDS that limits as far as possible the volume of and rate at which surface water enters the public sewer system. By doing this, SuDS have the potential to play an important role in helping to ensure the sewerage network has the capacity to cater for population growth and the effects of climate change. SuDS not only help to mitigate flooding, they can also help to: improve water quality; provide opportunities for water efficiency; provide enhanced landscape and visual features; support wildlife; and provide amenity and recreational benefits. We therefore also support Policy EP1 part iii) in particular.</p> <p>In relation to flood risk, the National Planning Practice Guidance (NPPG) states that a sequential approach should be used by local planning authorities in areas known to be at risk from forms of flooding other than from river and sea, which includes "Flooding from Sewers".</p> <p>When reviewing development and flood risk it is important to recognise that water and/or sewerage infrastructure may be required to be developed in flood risk areas. By their very nature water and sewage treatment works are located close or adjacent to rivers (to abstract water for treatment and supply or to discharge treated effluent). It is likely that these existing works will need to be upgraded or extended to provide the increase in treatment capacity required to service new development. Flood risk sustainability objectives should therefore accept that water and sewerage infrastructure development may be necessary in flood risk areas.</p>

Ref. No.	Respondent	Policy/ Para	Comments
			Flood risk policies should also make reference to 'sewer flooding' and an acceptance that flooding can occur away from the flood plain as a result of development where off site sewerage infrastructure and capacity is not in place ahead of development.
REP/038	Waverley Borough Council	H1	<p>Waverley acknowledges the draft Crawley plan seeks to deliver 5,355 homes from 2020 to 2035. This is 5,925 homes short of the housing need assessed under the government's standard method. Waverley recognises the inclusion in Policy H1 states that this shortfall will be met by working closely with its neighbouring authorities, particularly those in the Northern West Sussex Housing Market Area, primarily Horsham, Mid Sussex and Reigate &amp; Banstead.</p> <p>Waverley welcomes the policy making an explicit reference to meeting their housing shortfall within the Housing Market Area that it lies within. Waverley is unlikely to be able to take any further housing to meet unmet need when we review our Local Plan. Our adopted Local Plan housing requirement already includes unmet need from Woking. Therefore, Waverley considers that Crawley's unmet need must be met within the Housing Market Area that Crawley lies within.</p> <p>This is an officer response prepared in liaison with the Council's Head of Planning Policy and Services.</p> <p><b>Suggested Modifications:</b> None</p>
REP/032	West Sussex County Council	SD2	<p>West Sussex County Council have worked with Crawley Council to develop their "Enabling Healthy Lifestyles and Wellbeing" Policy SD2. WSCC's Public Health Team formally support Policy SD2 and any other policies supporting and looking to increase health and wellbeing in the area.</p> <p>In addition, we formally support the requirement from developers to complete Health Impact Assessments (HIA) as a 'must' have requirement to mitigate negative impacts and unintended consequences as a result of development that may have an impact on increasing health inequalities especially in regards to our most vulnerable population groups. This offer of support is in line with the West Sussex County Council's Public Health's position which is to:</p> <ul style="list-style-type: none"> <li>• Recommend that a health impact assessment (HIA) is undertaken for all major plans, policies and development proposals across West Sussex.</li> </ul>
REP/032	West Sussex County Council	IN2	<p><b>Policy IN2 The Location and Provision of New Infrastructure:</b> It should be noted, demand for education provision in Crawley has increased in recent years. A free school (under Wave12) for secondary education has been authorised. Sites are being investigated, however, there is difficulty in finding a site. The new school is necessary to fulfil current demand and it is expected to provide further capacity in the area.</p> <p><b>Suggested Modifications:</b> If, for whatever reason, the Free School is not delivered, there will be an impact on education provision to serve any additional housing development within the Borough within the plan period and an alternative secondary school site(s) will need to be found to serve both current and future secondary demand.</p>
REP/032	West Sussex County Council	IN3	<p>West Sussex County Council have worked with Crawley Borough Council to develop their Policy INF3. WSCC encourage Crawley Borough Council's ambition ensure coverage of gigabit-capable full fibre infrastructure, which is in line with the government's target for all premises to be able to access gigabit speeds by 2025.</p> <p>WSCC strongly supports that planning authorities hold policies that prioritise how, in making planning deliberations, they ensure developers make provision for gigabit-capable full fibre network and welcomes Policy IN3 in ensuring all development - residential, employment and commercial - is future ready.</p>

Ref. No.	Respondent	Policy/ Para	Comments
			We appreciate that reference is particularly made to <i>'gigabit-capable full fibre infrastructure'</i> in order to provide future-proofed broadband services and to support the delivery of future technologies.
REP/032	West Sussex County Council	ST1	<p>This note sets out officer comments upon the proposed submission documents, highlighting key issues and suggesting changes which the County Council is requesting be made to the Local Plan prior to adoption by Crawley Borough Council.</p> <p><b>Transport objection to the Submission Draft Local Plan on the grounds that it has not been 'Positively Prepared' and 'Consistent with national policy'. WSCC would wish to participate in the examination hearings.</b></p> <p>In the County Council's response to the consultation on the draft Crawley Local Plan Review (Reg. 18) the Borough Council was advised to develop a transport evidence base to assess the impacts of development on the transport network and identify mitigation measures.</p> <p>Significant new development is planned through the employment and housing policies:</p> <ul style="list-style-type: none"> <li>• EC1: Sustainable Economic Growth;</li> <li>• EC3: Office Provision;</li> <li>• H1 Housing Provision; and</li> <li>• H2: Key Housing Sites</li> </ul> <p>At present, there is no transport evidence base to support these proposals. Transport study work is about to be commissioned (February 2020) with technical support from the County Council. This work is required to demonstrate the impact of the proposed development on the transport network and the transport measures required to demonstrate compliance with paragraphs 102 to 111 of the National Planning Policy Framework, with particular reference to paragraphs 108 and 109 shown below:</p> <p><b><i>"Considering development proposals</i></b></p> <p><i>108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:</i></p> <p><i>a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;</i></p> <p><i>b) safe and suitable access to the site can be achieved for all users; and</i></p> <p><i>c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.</i></p> <p><i>109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."</i></p> <p>As such the completion of the transport study work and agreement of a viable and deliverable strategy for mitigation is fundamental to successfully demonstrating the soundness of the Plan.</p> <p>As this piece of work has not yet started it is not yet known what the total trip generation of the proposed site allocation will be, or how the resulting travel demand will be distributed across the highway and public transport networks. It is common practice for this evidence to have been completed prior to the Regulation 19 Consultation. As it has not been completed it is important to stress that it is crucial that the study is completed prior to Plan Submission, as the County Council cannot consider the plan to be sound until:</p> <ul style="list-style-type: none"> <li>• the impact of the housing and employment allocations is identified in scale and location; and</li> <li>• a transport strategy for sustainable transport (led) and highway solutions to mitigate impacts to capacity, safety and environment has been designed and is demonstrated to be:</li> </ul>

Ref. No.	Respondent	Policy/ Para	Comments
			<ul style="list-style-type: none"> <li>○ effective;</li> <li>○ fully and reliably costed;</li> <li>○ affordable; and</li> <li>○ Without barriers to delivery which may not be overcome.</li> </ul> <p>The brief for the Transport Study, which has been agreed between the Borough Council, County Council and Highways England is considered to be a sound basis to allow the study to achieve this position. The County Council will continue to provide technical advice to support this work and offer assistance as necessary to address the soundness of the Plan. However, given that this work is expected to take several months during which outcomes will remain uncertain, the County Council objects to the housing and employment allocations in the Plan until such time as the transport evidence base and resulting transport strategy is completed and agreed to the Council's satisfaction.</p>
REP/032	West Sussex County Council	Infrastructure Plan	<p><b>These comments relate to the Infrastructure Plan – for information</b></p> <p><b>Page 14 'Current Findings' seventh bullet:</b> should be amended to reflect the expansion of Ifield Community by 1FE from 2020 and so lowering the overall demand</p> <ul style="list-style-type: none"> <li>• A site for a <del>8-10</del> <b>6-8</b> FE secondary is therefore required going forward. Due to the lack of an identified site in Crawley ....</li> </ul> <p><b>Transport – Road (page 32) Evidence base:</b> reference to the signalisation of Bewbush Manor Roundabout is not mentioned in this section</p>

## **Appendix H: Formal Letter to All Neighbouring Authorities to Clarify Crawley Borough Level of Unmet Needs (January 2020)**

Sent to:

- Adur and Worthing Councils
- Arun District Council
- Brighton and Hove City Council
- Chichester City Council
- London Borough of Croydon Council
- Horsham District Council
- Lewes and Eastbourne Councils
- Mid Sussex District Council
- Mole Valley District Council
- Reigate and Banstead Borough Council
- Tandridge District Council

## Economy & Planning Services

Contact: Elizabeth Brigden      Date: 21 January 2020  
Direct Line: 01293 438624      Email: [elizabeth.brigden@ Crawley.gov.uk](mailto:elizabeth.brigden@ Crawley.gov.uk)

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By Email Only

Dear Councillor,

### **Crawley Borough Local Plan Review 2020 – 2035: Duty to Cooperate**

As you may be aware, the Crawley Borough Local Plan Review 2020 – 2035 was approved for publication and submission at the Full Council meeting held on 16 December 2019. The publication consultation will take place for a 6-week period commencing **Monday 20 January until Monday 2 March 2020**.

The Local Plan has been prepared in the context of substantial, positive, ongoing cross-boundary working carried out over the various functional strategic areas in which Crawley forms part and I acknowledge and thank you for this.

The purpose of this letter is to draw your attention to the critical outcomes of the Crawley Local Plan in relation to meeting Crawley borough's objectively assessed development needs. I invite your comments on the information provided and formally request confirmation of the role your authority is able to play in assisting my council in addressing identified unmet development needs under the Duty to Cooperate provisions.

I have extended the range of this letter to those authorities considered to have some degree of strategic planning relationship with Crawley even where administrative boundaries are not shared.

As has been acknowledged in the currently adopted Local Plan (Crawley 2030), in light of Crawley's tight administrative boundaries, the historic Gatwick Airport 'safeguarded' land for a potential southern runway and physical constraints such as aircraft noise contours, flooding, nature conservation constraints and few infill opportunities due to the age and planned nature of the New Town, there is very limited land within the borough for accommodating further development.

There is already long-established, effective joint working within the Northern West Sussex (NWS) Housing Market Area (HMA). Crawley's unmet housing need established from the adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently, the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings, predominantly to meet Crawley's unmet needs, above their objectively assessed housing needs, over the period from 2020. However, it is acknowledged that through Local Plan Reviews this is likely to change, particularly as the Standard Method increases the housing needs within these districts above those established in the adopted Plans.

The updated total **unmet need**, calculated for the Local Plan Review, against the assessed needs for both housing and employment, arising from within Crawley over the Plan period (2020 – 2035) is:

- Housing: 5,925 dwellings;
- Employment: a minimum 21ha of land for B Use Classes, based on a continuation of past development levels with a constrained employment land supply.

The following sections of this letter set out a summary of Crawley's position in relation to its housing and employment needs. Comments would be welcomed in relation to whether your authority is in agreement with the conclusions reached.

### Housing

Crawley's submission Local Plan confirms that the government's Standard Methodology for calculating housing need results in a total housing need for the 15 year plan period (2020-2035) of 11,280 dwellings (based on 752 dwellings per annum).

The draft Local Plan identifies the borough's land supply allows for almost half of this to be met on sites within the borough's administrative boundaries: a minimum totalling 5,355 dwellings (an increase of 549 dwellings since the Regulation 18 Local Plan (July 2019) due to additional sites and increased densities of existing sites following their reassessments). This equates to an annualised average of 357dpa.

However, a stepped trajectory is reflected in the Policy to account for the higher delivery in the early Plan period and the lower anticipated levels towards the end (due to the build out of the last remaining large sites available within the borough):

- Years 1-5 (2020-25): 500dpa
- Years 6-10 (2025-30): 450dpa
- Years 11-15 (2030-35): 121dpa

The council is working hard to maximise capacity within the borough's boundaries, including by introducing extremely high density targets for the Town Centre and accessible locations (Policy CL5) and a series of housing typology policies to positively influence development opportunities within, and immediately beyond, the borough (Policies H3, and H3a-H3g).

This leaves a total unmet need figure of 5,925 dwellings to be accommodated within the wider housing market area, insofar as is consistent with the National Planning Policy Framework and delivery of sustainable development.

In addition to the overall unmet housing needs amount, the 2019 Strategic Housing Market Assessment (SHMA) has considered the needs of specific communities within the borough. This has included:

- Those who require affordable housing
- Families with children
- Older people
- Students
- People with disabilities
- People who rent their homes and
- People wishing to commission or build their own homes.

### *Affordable Housing:*

With particular reference to affordable housing, the SHMA has highlighted a net need for 739 affordable homes per year in Crawley (of which 563 dwellings per year are needed as rented affordable housing). As Crawley is only able to meet approximately 50% of its overall housing needs within the borough, even with the 40% affordable housing requirement established by the Local Plan policy (Policy H5) there will be a significant shortfall of affordable housing.

Therefore, where Crawley's unmet housing needs are being met outside the borough boundary, it is requested discussions can take place to explore and agree mechanisms for opportunities for Crawley's affordable housing needs to similarly be met, including through nomination rights being extended to residents on Crawley's housing register. This is particularly, but not restricted to, where housing needs are being met by developments on Crawley's boundaries.

### *Self and Custom Build Homes:*

The SHMA has also highlighted the need for Duty to Cooperate discussions to explore opportunities to meet needs of those who wish to Self- or Custom-Build their own home. As a planned, urban New Town, the potential for meeting the level of development needed is limited within Crawley borough. Also, the high density nature of the majority of Crawley's anticipated delivery, particularly in the Town Centre, is not often appropriate for Self- or Custom-Builders.

The emerging Crawley Borough Local Plan proposes a draft policy approach. However, discussions would be welcomed to consider whether there are opportunities for this to be considered over a wider area (particularly if there are duplicate entries across districts and boroughs).

### Employment

In addition to the unmet housing needs, joint working undertaken across Northern West Sussex through the joint commissioning of the recent Economic Growth Assessment (EGA), 2020, has highlighted continued significant anticipated levels of economic growth in the Functional Economic Market Area. Much of the identified growth is associated with the economic strength of Crawley and Gatwick.

The EGA identifies a need for a total of 33 hectares of business land in Crawley over the Plan period, based on a continuation of past development levels which are based on a constrained land supply. As identified by the Employment Land Trajectory, the available business land supply pipeline within Crawley is approximately 12ha, resulting in an outstanding current requirement for 21ha business land.

However, there is potential for a greater level of business growth in Crawley, which uses the 'unconstrained' housing need figure of 752dpa, which identifies a projected B-class business land requirement of 113ha. This level of growth is considered likely to be needed should further major urban extensions to Crawley come forward.

In order to take a proactive approach to addressing economic growth needs in the area, the draft Crawley Local Plan proposes the removal of "safeguarding" of land for a potential southern runway at Gatwick Airport. This land, covering 613ha to the north of Crawley, between the town and the Airport, has instead been designated for an Area Action Plan (AAP).

The AAP will assess the needs for future growth and operational needs of the airport alongside other development needs arising in Crawley, including:

- i. Economic growth;
- ii. Housing (although this will be very limited due to noise constraints from the existing runway);
- iii. Infrastructure;
- iv. Community/recreation facilities; and
- v. Other uses identified through the evidence gathering and consultation on the AAP.

The council is committed to commencing work on the AAP within three months of the adoption of the Local Plan and it may conclude that sites for Strategic Employment Location(s) can be identified within Crawley, should some or all of the AAP land not be required for airport expansion. The AAP will be a future Development Plan Document.

I would welcome a written response from your local authority by **Monday 2 March 2020**, to help formalise the understanding between us with regard to whether your authority is able to assist Crawley in meeting its unmet needs.

Similarly, please let me know if your authority considers there are any other strategic issues not sufficiently covered or ways in which you believe Crawley may be able to assist you in your strategic planning needs.

Please contact me or my officer, Elizabeth Brigden, should you have any questions or require further clarification with any of the content included above.

I look forward to continuing to work with you in the future to seek positive solutions to these challenging strategic issues.

Yours Sincerely,

A handwritten signature in black ink, appearing to read 'Peter Smith', with a horizontal line underneath.

Cllr. Peter Smith  
Cabinet Member for Planning and Economic Development

## **Appendix I: Responses from Neighbouring Authorities to Crawley Unmet Needs Letter**

- Adur and Worthing Councils (12 February 2020)
- Brighton and Hove City Council (13 February 2020)
- Horsham District Council (2 March 2020)
- Mid Sussex District Council (2 March 2020)
- Mole Valley District Council (2 March 2020)
- Reigate and Banstead District Council (2 March 2020)
- Tandridge District Council (3 February 2020)



# ADUR & WORTHING COUNCILS

## Planning and Development

Councillor Peter Smith  
Crawley Borough Council

By Email to Elizabeth Brigden

Our Ref: JA/MH/lja  
Your Ref:

12<sup>th</sup> February 2020

Dear Councillor Smith,

Crawley Borough Local Plan Review – Duty to Co-operate.

Many thanks for your letter dated 21<sup>st</sup> January 2020.

Thank you for consulting Adur District Council and Worthing Borough Council (Adur and Worthing Councils - AWC). We welcome the progress made on the Crawley Local Plan and acknowledge the considerable efforts made to maximise opportunities to meet development needs in the Borough, as well as the joint working arrangements already in place within the Northern West Sussex Housing Market Area. We note that the Plan seeks to provide a minimum of 5,355 dwellings up to 2035, and that this results in an unmet need of approximately 5,900 dwellings and over 21ha of B class employment land.

As you are probably aware, development opportunities in both Adur and Worthing are highly constrained due to their location between the South Downs National Park and English Channel, and it has previously been accepted that neither authority would be able to meet their own needs.

Although the Adur Local Plan was adopted in December 2017, the adopted target delivers just 54% of the Objectively Assessed Need identified through the Local Plan review (resulting in a shortfall of 3,107 dwellings). As such, Adur district is unable to accommodate unmet need from other authorities. Furthermore, the future review of the Adur Local Plan will, of course, be based on the Standard Methodology, and is likely to result in a further, significant shortfall.

The Draft Worthing Local Plan (Reg 18) published at the end of 2018 reported that the identified need for Worthing over the plan period equated to over 750 dwellings a year. More recent calculations made to inform the Submission Draft version of the Plan (expected in the autumn) now indicates a total housing need over the Plan period of over 15,000 dwellings per annum (approximately 900 dwellings / year).



To meet as much of this need as is sustainable the Council has taken a proactive approach towards maximising opportunities to deliver as much housing as possible - leaving 'no stone unturned'. This has included a positive and robust assessment of all greenfield sites around the borough and a review of intensification opportunities to ensure that development opportunities are maximised whilst taking account of environmental constraints and the lack of available land. Despite this, the Draft Local Plan indicated that only 39% of the identified need would be met over the Plan period. Whilst the precise level of supply (and shortfall against need) within the Submission version of the Plan is still being calculated it is clear that given the constraints that the Borough is subject to, Worthing will never be in a position to meet its own need (as currently calculated). The lack of land available for Worthing to meet its need was previously accepted in the South East Plan.

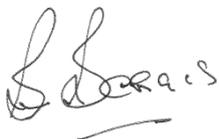
Given the above, unfortunately neither Adur District or Worthing Borough is able to assist with delivering Crawley's unmet needs (both for housing and employment land).

Adur and Worthing Councils have been engaging with Crawley Borough and other local authorities via the West Sussex and Greater Brighton Strategic Planning Board. We look forward to working together to explore how the sub-region's development needs can be met in the longer term.

Yours sincerely

A handwritten signature in black ink, appearing to read 'K Jenkins', with a horizontal line underneath.

Councillor Kevin Jenkins  
Worthing Executive Member for Regeneration

A handwritten signature in black ink, appearing to read 'B Boggis', with a horizontal line underneath.

Councillor Brian Boggis  
Adur Executive Member for Regeneration

City Planning  
Brighton & Hove City Council

Councillor Peter Smith  
Cabinet Member for Planning and Economic Development  
Crawley Borough Council

13 February 2020

Dear Councillor,

**Crawley Borough Local Plan Review 2020 – 2035: Duty to Cooperate**

Thank you for your letter of 21 January 2020 regarding the Crawley Borough Local Plan Review and the Duty to Cooperate. I note in particular the Borough Council's formal request for assistance in meeting Crawley's unmet needs with respect to housing (including affordable housing) and employment.

Brighton & Hove shares similarities with Crawley Borough in being subject to severe physical and environmental constraints with the sea to the south and the South Downs National Park to the north, east and west of the built-up area. This has led to a shortage of potential development sites and a substantial unmet housing need. It should also be noted that Brighton & Hove is a considerable distance from Crawley (over 20 miles) and falls within a different housing and functional economic market area, although there is some overlap between the Greater Brighton and northern West Sussex market areas.

Draft Crawley Borough Local Plan 2020 – 2035: Submission Consultation

Brighton and Hove City Council (BHCC) does not wish to make any detailed comments on the draft Crawley Borough Plan. However, we support the commitment to maximise capacity within the Borough's boundaries and the intention to prepare an Area Action Plan for land between the town and Gatwick Airport, which may offer opportunities for Strategic Employment Location(s).

Duty to Cooperate

Brighton and Hove City Council (BHCC) is committed to engaging positively with its neighbours to address strategic planning matters through the Duty to Cooperate and to ensure that any 'larger than local' issues are highlighted and addressed. The City Council is a member of the West Sussex and Greater Brighton Strategic Planning Board (established in 2013) which also includes Crawley BC. The purpose of the Board is to identify and manage the spatial planning issues that impact on more than one local planning authority area and support better integration and alignment of strategic spatial and investment priorities.

The Board is currently working towards preparing a third revision of the Local Strategic Statement (LSS3), which will explore options for meeting the area's unmet needs for housing and employment, and identify the strategic infrastructure required to support the planned growth. It is intended that LSS3 will provide a longer term strategy for the sub-region over the period 2030-2050 which will help guide the future location and delivery of development to be identified and allocated within the constituent Local Plans. This joint work demonstrates the level of commitment on behalf of the constituent local planning authorities to working collaboratively in line with the requirements of the NPPF. However, the work to prepare LSS3 is still at an early stage with limited progress so far.

BHCC adopted the Brighton & Hove City Plan Part One (CPP1) in March 2016. CPP1 sets the strategic planning framework for the city to 2030 and sets minimum levels of housing and employment floorspace to be delivered over that period. The Council is currently progressing work on the preparation of City Plan Part Two (CPP2) which includes site allocations and detailed development management policies. It is intended to publish the CPP2 Proposed Submission draft for Regulation 19 consultation in May/June 2020 and then to submit CPP2 for examination in Autumn 2020.

## Housing

CPP1 sets a housing provision target to deliver a minimum of 13,200 new dwellings over the period 2010- 2030 (660 net dwellings per annum). This figure falls well short of the city's objectively assessed housing needs (OAN) which were assessed in 2015 as 30,120 net dwellings (1,506 net dwellings per annum), which reflects the constraints affecting the city. It should be noted that, following submission of the draft CPP1 in 2013, the examination inspector required the Council to undertake further detailed work to assess more rigorously all opportunities to meet the city's housing need, including detailed studies to assess the potential for housing development on the urban fringe. As a result of this work, the CPP1 housing provision was increased from 11,300 to 13,200 homes in the current adopted Plan. However, there remains a significant unmet housing need with the City Plan providing for only 44% of the estimated OAN.

The 2015 housing assessment also identified a net need across the city for 810 affordable homes per year (representing 61% of the total OAN). Taking account of land availability and viability considerations, the affordable housing

policy in CPP1 seeks 40% affordable housing on sites of 15 or more dwellings, with lower percentages sought for smaller housing developments. Reflecting this, the CPP1 Implementation and Monitoring Plan sets a target to achieve approximately 30% of all housing delivery as affordable housing. Again this falls well short of the city's assessed requirement.

The City Council has also fallen well short of meeting the demand for self- or custom-build homes identified on the council's housebuilding register. As in Crawley Borough, there is limited scope for meeting the demand within the city, as there are very few greenfield housing opportunities with the vast majority of housing development comprising high density development on brownfield urban sites.

### Employment

The evidence supporting CPP1 identified growth requirements within Brighton & Hove for an additional 112,240 sq.m of office floorspace (B1a, B1b) and 43,430 sq.m of industrial floorspace (B1c, B2 and B8). As with housing, opportunities to meet the city's employment space requirements are extremely constrained due to the limited supply of suitable sites. In addition, there is strong market demand to redevelop existing employment sites for housing and other higher value uses and there has been substantial loss of office space to housing through permitted development rights since their introduction in 2013.

CPP1 sets out a framework to safeguard and upgrade current employment sites in the city and to create new employment floorspace through the regeneration of key sites. Overall the Plan includes provision for up to 96,000 sq.m office floorspace and 9,000 sq.m industrial floorspace. However, despite this, there has been an overall net loss within all categories of employment floorspace (B1-B8) in the city over the period since 2010. Given the difficulties in meeting the city's own employment needs, there is currently no scope to meet the unmet employment needs of neighbouring areas.

For the reasons set out above, regrettably, the City Council is not in a position to help meet any of Crawley's unmet housing or employment development needs. The Council does not consider that there are any other strategic issues involving Crawley that would need to be addressed through the Duty to Cooperate.

Yours sincerely,



**Councillor Nick Childs**

Lead Member for Planning Policy

Cllr Peter Smith  
Cabinet Member for Planning  
and Economic Development  
Crawley Borough Council, Town Hall  
The Boulevard  
Crawley  
RH10 1UZ  
*Sent by email to Elizabeth Brigden, Planning Policy Manager*

Our ref: Crawley DtC

Your ref:

Date: 02 March 2020

Dear Cllr Smith

### **Re: Crawley Borough Local Plan Review 2020-2035: Duty to Cooperate**

Thank you for your letter dated 21 January 2020. Horsham District Council is committed to continued close cooperation and joint working between our councils, reflecting our joint housing market area and common functional economic market area. I am pleased that we are building on our existing Northern West Sussex Authorities joint Position Statement and working towards an updated Statement of Common Ground between Crawley Borough Council and Mid Sussex and Horsham District Council.

You have rightly identified a number of key Duty to Cooperate issues on which I have provided my initial response below. We recognise that you are still preparing a number of key pieces of evidence to support the draft Crawley Plan, and by corollary the proposed unmet need figure. Our comments are therefore not able to reflect the outcome of these studies and we would welcome the opportunity to review and comment as they become available. These studies include the Transport Study, the Viability Study, and a Windfall Allowance Review. A further key piece of work which is in our view needed to provide a solid basis for further discussion is a study which examines appropriate densities and potential infill and regeneration opportunities in Crawley (a 'densification study'), the potential scope of which is discussed in further detail below.

Clearly such matters will be a basis of ongoing discussion between our authorities and I am confident that we can reach positive outcomes on these matters.

### **Housing**

You have formally asked what role HDC is able to play in assisting CBC in addressing unmet housing needs. You have stated that the total unmet need for housing arising from Crawley for the period 2020-2035 is 5,925 dwellings.

#### *Capacity in Horsham District*

Horsham District currently has a housing target of 800 dwellings per year which includes an annual contribution towards the current Crawley unmet need of 150 dwellings per year. This provides a significant amount of housing which, together with sites in Mid Sussex District, has ensured that the previously assessed housing need for the North West Sussex area has largely been met. As you will know the need is being met through strategic sites including the West of

Bewbush strategic allocation as set out in the Joint Area Action Plan that was adopted by both councils in 2009 and Land to the North of Horsham.

The Horsham District Local Plan review has reached Regulation 18 stage and has been published for a period of consultation between 17 February and 30 March 2020. The consultation document reaffirms that the main housing market area for the District continues to be North-West Sussex, but that the south east of the district also falls within the Coastal Sussex housing area. As reported in the jointly prepared North West Sussex HMA SHMA, the assessed Local Housing Need for Horsham is 965 homes per annum, compared with the 650 per annum need established in the Horsham District Planning Framework before the 150 homes to meet Crawley’s unmet need is added. We are currently testing options for the overall level of growth, as follows:

1000 homes per year	This would meet the minimum local housing need as determined using the Government’s standard formula. This would fully address the housing need in Horsham District, together with the 5% buffer that is required to provide flexibility, but would not provide any additional housing towards the unmet housing needs of Crawley and the Coastal Sussex area.
1,200 homes per year	This would meet the local housing need and 5% buffer. It would also provide around 200 homes each year to help meet the unmet housing needs of Crawley in particular, and a small element in the Coastal Sussex area.
1,400 homes per year	This would meet the local housing need and 5% buffer and provide around 400 homes each year to help meet the unmet housing needs of Crawley and the Coastal Sussex area.

This demonstrates that the Council accepts the principle that there is an unmet housing need in Crawley and that this has to be taken into account as we take forward our own local plan. Notwithstanding this, there are known to be significant challenges in meeting even the lower level of growth highlighted above, and we will not know what capacity (if any) there will be to meet additional growth requirements relating to Crawley, over and above the local housing need for Horsham district (965 dpa, compared with the 800 dpa target in the adopted Horsham District Planning Framework). There is significant work being done to support the emerging Horsham District Local Plan Review in this respect, the outcome of which will not be known for some months.

To assist you I have highlighted below the known significant constraints to achieving the very high levels of growth that would be needed in Horsham District to make a substantive contribution to the Crawley unmet need, and the work currently being undertaken to find out the extent to which these limit capacity to meet this.

<b>Constraint</b>	<b>Details</b>	<b>Action / evidence</b>
Landscape capacity	Horsham district has two areas of nationally designated landscape protection: the South Downs National Park to the south (14.3% of the District – HDC is not the planning authority), and the High Weald AONB to the north-east (7% of the District). Much of the rest of the district enjoys very good quality landscape, which is highly valued by local communities, and provides many	HDC is currently reviewing its Landscape Capacity Study. Final site assessments relating to prospective new site allocations will take account of this evidence, and seek to avoid areas of low/no capacity for development.

	opportunities for informal recreation for surrounding areas, including Crawley.	
Environmental constraints	Much of the landscape of the District is still heavily wooded of which over 6% is classified as ancient woodland. Approximately 8% of the land is designated for its importance in nature conservation terms, including the Arun Valley Special Protection Area and the Mens Woodland SAC, which are of international importance. The Mens Woodland SAC has a secondary area of constraint relating to the protection of bats which forage beyond the Internationally-designated site. 6% of the district is located within functional floodplain, however, the majority of the district is very rural in character with its natural fluvial and surface water management role.	These environmental constraints are inherent constraints. Opportunities for mitigation will be tested through the Local Plan review, by way of the Habitats Regulation Assessment process and the Sustainability Appraisal.
Pressure on infrastructure	There is justifiable concern within HDC and across communities that the scale and pace of development in Horsham district will lead to failure of infrastructure to cope. There are particular concerns for the combined impact that large scale new development will have on the transport networks. Education provision is also at capacity in some areas of the district. Significant new development will require new infrastructure to be provided potentially including new sewage works. Larger pieces of infrastructure provision may delay the level of development that can be supported until they are in place.	HDC is preparing a new Infrastructure Delivery Plan (IDP) to identify where the significant gaps are likely to occur, and how these might be addressed. HDC is also preparing a comprehensive Horsham District Transport Study, focusing on the road network, which includes a strategic model to assess likely impacts of growth scenarios and identify appropriate mitigation. A Water Cycle Study is also being prepared jointly with Crawley BC and Mid Sussex DC.
Market absorption of scale of growth	The level of growth necessary to go above and beyond the minimum Local Housing Need is unprecedented. We are aware that delivery rates are an area of scrutiny at Local Plan Examinations and have to be clearly demonstrable. The ability of the market to deliver enough homes annually may stymie the growth levels required for meeting additional need from neighbouring areas.	HDC has commissioned Icen Projects Ltd to undertake a Housing Delivery Study. This will provide a steer on the limits housing market geographies and developer practices will have on overall levels of development in the district.

There are of course a number of further constraints that HDC has or will provide evidence on, which will have a further bearing on realistic levels of development. These include viability and flood risk.

### *Capacity in Crawley District*

In your letter you state that CBC is working hard to maximise capacity within the borough's boundaries. I am pleased to see that the draft plan has sought to identify a number of different mechanisms by which the standard housing methodology figures as calculated for Crawley Borough could be achieved. I note that this covers a range of approaches, including through increased densities, estate regeneration, the development of any surplus open spaces, town centre development and upward extensions, increased building heights and garden sites.

However we remain unclear at this stage as to the extent to which the potential yield that such approaches could generate over the plan period has been considered, and whether there is potential for this to assist housing delivery, particularly in the latter part of the plan period. For example Policy CL5 sets minimum densities for development, and Policy TC3 identifies a number of Key Opportunity Sites in the Town Centre. Paragraph 11.19 states that at least 1,500 dwellings are anticipated across all of these sites (consistent with Policy H1), however there is no clear evidence of how this number has been arrived at, or whether a comprehensive study of opportunity sites within the town centre, and appropriate densities within these, has been undertaken.

It is not clear to me how opportunities for estate regeneration (and associated densification) have been looked at. The draft Local Plan in paragraph 12.55 states that there are no estate regeneration projects planned in Crawley. We would welcome discussion as to why this has not been taken forward as an option for increasing housing delivery within Crawley Borough whilst also delivering significant community benefits.

I note that the Strategic Housing Land Availability Assessment (SHLAA) supporting the emerging Local Plan makes an assumption that the Gatwick southern runway may still come forward, and incorporates an assumption that maximum permissible noise levels may therefore be exceeded. This change appears to have had the effect of ruling out large sites of several hectares which had previously been included in the housing trajectory for the 2015 Local Plan. The SHLAA recognises that such sites may be reconsidered as part of the North Crawley Area Action Plan. Although we appreciate there are considerable uncertainties in relation to this matter, it could be argued that such sites should not have been ruled out at this stage, given the increase in housing need for Crawley and for the housing market area. Again, we would welcome further discussion around these points.

Further areas of investigation regarding land use efficiency and maximising delivery within Crawley Borough could reasonably include:

- i. A more generous assumption relating to windfall development (currently assumed at 55 dwellings per hectare). It is noted that the draft Local Plan refers on page 223 to a background document 'Windfall Allowance Review 2020-2035' however this does not appear to have been published on your website.
- ii. Positive identification at the plan-making stage of any further surplus or under-used green space or industrial land in Crawley Borough (albeit it is recognised that fit-for-purpose green infrastructure should be protected and enhanced). It is noted that currently published open space studies are some 6 years old and may now be in need of update;
- iii. Reassess whether sites in the SHLAA should have been found to be unsuitable for development. The airport noise contour issue has already been mentioned above, and there are further justifications given for rejecting sites that could be better evidenced,

e.g. site adjacent (but not within) a flood risk area, or the higher infrastructure costs associated with redeveloping industrial sites.

In summary, Horsham District Council recognises that some steps are being taken to increase housing delivery within Crawley Borough, but we would question whether sufficient evidence exists to show that there has been no stone unturned. We therefore request that a more comprehensive study which examines appropriate densities and potential infill and regeneration opportunities in Crawley is undertaken (i.e. a 'densification study'). This should consider the above questions and others as appropriate, to provide a robust understanding of how much of the Crawley housing need should in principle be accommodated by neighbouring authorities including Horsham district.

### *Affordable housing*

I note your request to discuss the issue of nominations rights for affordable housing being delivered outside Crawley Borough to meet Crawley's unmet needs. For HDC's part, we are obliged first and foremost to prioritise meeting our own very significant housing needs, which includes an assessed need for 503 affordable homes per year. It will be very difficult to meet this in full, even with a high policy requirement, and it is therefore anticipated that there may be limited opportunity to meet a significant proportion of Crawley's affordable housing need on top.

### **Employment**

I note your comments on an unmet need for employment land supply. It is encouraging to note that there may be opportunity to meet this through the North Crawley AAP. I also understand that Crawley has further opportunity to work with Reigate and Banstead Borough Council to further address the need through allocation of employment land in that district.

For Horsham's part, our emerging Local Plan has the key aim of maximising the self-containment of the district, and to this end we are working to the principle of providing one job per new home. Clearly if there is land allocated in Horsham District to help meet Crawley's unmet housing needs, we would expect employment to come forward to meet the employment needs of those communities, thereby helping to address the 'unconstrained' growth scenario you outline in your letter.

### **Next steps**

I would welcome further discussions on the full range of issues covered by the Duty to Cooperate. We will of course continue to look for opportunities to meet the wider unmet development needs of the area, but this has to be in the context of prioritising the needs of our own District, and dependent on an appropriate level of evidence being made available to support the unmet needs 'ask' from Crawley. I believe both authorities recognise the scale of the challenges we jointly and respectively face, and look forward to positive and meaningful discussions to support our respective local plans. My officers will continue to engage and be available for such discussions in the first instance.

Yours sincerely,



Councillor Claire Vickers  
Cabinet Member for Planning and Development

**Contact:**

Councillor Andrew MacNaughton Tel: 01293 522817  
email: [andrew.macnaughton@midsussex.gov.uk](mailto:andrew.macnaughton@midsussex.gov.uk)

**Your Ref:**

**Our Ref:** AMN/RS

**Date:**

2<sup>nd</sup> March 2020

By e-mail only  
[forwardplans@Crawley.gov.uk](mailto:forwardplans@ Crawley.gov.uk)

Dear Councillor Smith,

**Crawley Local Plan Review 2020 – 2035 –Duty to Cooperate**

Thank you for your letter of 21<sup>st</sup> January 2020, in which Crawley Borough Council has asked for this Council's view on several matters, including the role Mid Sussex may have in assisting Crawley Borough Council in addressing identified unmet development needs under the Duty to Cooperate provisions. Please note that I will be responding to your Local Plan Regulation 19 Consultation (which started on 20 January) in a separate letter.

Mid Sussex District Council is committed to working jointly and proactively with neighbouring authorities to address identified development needs. This commitment is set out in Policy DP5: Planning to Meet Future Housing Need of the Mid Sussex District Plan and is reflected in the ongoing cross council working between Horsham, Crawley and Mid Sussex. As part of this there is ongoing work over the preparation of an updated Statement of Common Ground between Horsham and Crawley Councils given our joint housing market area (HMA) and functional economic market area (FEMA).

In your letter you asked for confirmation of the role Mid Sussex can play in meeting unmet housing needs; if Mid Sussex could help meet the needs of specific communities including affordable housing, and self-build/custom build housing; comments on the evidence base regarding quantum of unmet needs; and Mid Sussex's views on the proposed approach to delivery of a significant level of employment development on the land previously safeguarded for a southern runway at Gatwick Airport.

I have addressed each of these matters in turn below.

The Role of Mid Sussex in Meeting Unmet Housing Needs

The Mid Sussex District Plan (2014 - 2031) was adopted in 2018. The District Plan has a housing requirement of 16,390. This is made up of the Mid Sussex Objectively Assessed Housing Need of 14,892 dwellings and 1,498 dwellings primarily to address Crawley's unmet need. Horsham District Council also commits in its adopted Local Plan to make an annual contribution towards the current unmet need for Crawley. Therefore, in the current adopted plans there is a commitment to assisting with the delivery of the previously assessed unmet need for the North West Sussex area.

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*Working together for a better Mid Sussex*

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Notwithstanding this principle, there are a number of significant constraints to development in Mid Sussex. In particular, Mid Sussex needs to ensure that there is no harm from development on the integrity of the European Habitat sites in the Ashdown Forest. The Inspector into the Mid Sussex District Plan agreed to an average requirement of 876 dwellings per annum (dpa) up to 2023/24 with a step to 1,090 dpa in the latter part of the Plan period, subject to there being no harm to the integrity of the Ashdown Forest. Indeed the Inspector made clear that the delivery of the amount of housing above 876 dpa must be subject to further Habitats Regulations Assessment (HRA). In order to ensure delivery of the housing requirement, Mid Sussex is preparing a Site Allocations Development Plan Document (the Sites DPD) to identify additional housing and employment sites to ensure the need established in the adopted District Plan is met in full over the Plan period. Work on the Site DPD is progressing, and it is anticipated that the document will be submitted for Examination in Summer 2020. This work must be completed to provide certainty over the allocation of sufficient deliverable sites to meet both this Council's need and help meet Crawley's unmet need to 2031.

Going forward, District Plan Policy DP5: Planning to Meet Future Housing Need, acknowledges that the three adopted Local Plans within the HMA (Crawley, Horsham and Mid Sussex) follow different time periods. Crawley's Local Plan expires a year before Mid Sussex's Plan and its review is taking place ahead of work by Mid Sussex to review its District Plan. As such, the adopted Mid Sussex District Plan only addresses unmet need up to 2031 and any future unmet need at Crawley has yet to be established or tested.

Whilst the review of the Mid Sussex District Plan will seek to address any further unmet development needs arising within the Housing Market Area this must be secured through the proper plan making process i.e. through the review of the District Plan. Such a process will establish the revised local housing needs and the preparation of a robust evidence base to ascertain if and how these needs can be met, including an HRA to test the impact on the Ashdown Forest. At this stage options and capacity for development beyond 2031 in Mid Sussex have not been tested and therefore it is not possible to confirm the role which Mid Sussex could play in assisting Crawley.

Mid Sussex confirmed through its examination that the District Plan Review would start in 2021, with submission to the Secretary of State by 2023. However, it is the Council's intention that the review should start in 2020/21 – bringing the review period forward by a year.

#### Crawley's Conclusions Regarding Unmet Housing Need

In your letter you also invite comments on the information provided to support the Crawley Local Plan's position regarding the level of unmet housing need and, on the conclusions reached.

I am aware that Crawley Borough is still preparing additional evidence to support its Plan (including the Transport Study and the Viability Study) which may have implications for the level of unmet needs identified and therefore comments below are made based on the current evidence base.

Mid Sussex has been kept informed of the updates to the Crawley and Horsham commissioned 'Strategic Housing Market Assessment', as part of the Council's continued joint working on housing matters. As a result, it is accepted that the total housing need in Crawley is 11,281 dwellings to 2035.

Mid Sussex notes and welcomes the additional work Crawley has undertaken since the publication of its draft Local Plan and welcomes the additional sources of housing supply (through increasing densities on sites and the identification of other sites) which has resulted in identification of a supply of a further 550 additional units.

Mid Sussex supports policies CL4 and CL5 which relate to making effective use of land. The Council welcomes the fact that Crawley is exploring mechanisms to increase housing supply. However, Mid Sussex considers that Crawley needs to provide additional evidence to demonstrate fully that all opportunities to increase capacity in Crawley have been taken. In particular it would be helpful if Crawley could set out the assumptions behind the capacity of Opportunity Sites (Policy TC3); assumptions behind the density policy (Policy CL5); that all opportunities for estate regeneration have been explored; and assumptions around the use of existing employment land and other uses which could be relocated onto the formally safeguarded land at Gatwick Airport (which I turn to in more detail below).

### Affordable Housing

I note your request to explore and agree mechanisms for opportunities for Crawley's affordable housing needs to be met outside of the Borough, including for nomination rights to be extended to residents on Crawley's housing register.

You will appreciate that Mid Sussex's immediate priority is to meet the significant affordable housing needs of those who live in Mid Sussex. The assessed need for affordable homes each year in this district is 258 dpa. Therefore it is very difficult for the Council to meet this need and as a result the Council has a record number of families in temporary accommodation.

### Self and Custom Build Housing

I note the concerns which you have set out regarding the opportunities in Crawley to deliver self and custom build homes.

This Council cannot commit to meeting any of Crawley's unmet need regarding this specific aspect of specialist housing provision until its own District Plan review is completed. However, I agree that discussions over processes regarding self-build registers would be helpful, particularly so that we can understand the actual level of demand given the likelihood of duplicate entries across districts and boroughs.

### Crawley's Conclusions on Employment Need

Crawley, Horsham and Mid Sussex have worked collaboratively to understand employment needs in the FEMA through the joint commissioning of the Economic Growth Assessment (EGA). The methodology and outcomes were jointly agreed and therefore I can confirm Mid Sussex's support for the evidence base material. Given the anticipated level of housing delivery in Crawley it is also accepted that there is an outstanding requirement for 21 ha of business land.

Mid Sussex notes that the level of employment land required would increase if Crawley delivered more housing although it is recognised that this is unlikely to be in the region of the 113ha of employment need cited in your letter. In addition to meeting Mid Sussex's employment needs, we are actively pursuing the development and delivery of a sub-regional Science and Technology Park which could contribute towards meeting unmet needs within the FEMA and could help to meet additional need should Crawley deliver further housing.

Mid Sussex supports the intention of the new Policy SD3 which makes provision for the preparation of an Area Action Plan (AAP) for the area of land to the south of Gatwick Airport that has historically been safeguarded to accommodate the possible construction of an additional runway and associated facilities. At 613ha the area of land is significant and would be able to accommodate the 21ha of unmet need for employment in Crawley whilst also accommodating other uses. For example, opportunities should be explored for the relocation of existing pockets of employment elsewhere in Crawley to this area to create an enhanced employment offer, thereby releasing additional sites for housing. In view of the new opportunities which Policy SD3 provide Mid Sussex would therefore suggest Policy EC1: Sustainable Economic Growth is revisited to allow for a more flexible approach towards the relocation of employment areas to the safeguarded land.

#### Next Steps

Mid Sussex welcomes the opportunity for further discussion with Crawley on these matters. My officers will continue to work with you in a positive manner.

Yours sincerely



Councillor Andrew MacNaughton  
Cabinet Member for Housing and Planning

Strategic Planning  
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2 March 2020

By email only

## **Crawley Borough Council Local Plan Review (2020-2035): Duty to Cooperate**

Dear Sir/Madam

Thank you for your 'Duty to Cooperate' letter dated 21 January 2020 setting out Crawley Borough Council's position in relation to meeting the boroughs objectively assessed development needs.

### **Housing**

CBC calculates their local housing need to be 752 dwellings per annum using the 'Standard Method' set out in planning practice guidance. This equates to a total housing need of 11,280 dwellings over the lifetime of the 15-year plan (2020-2035). Crawley's Local Plan Review identifies the borough's housing land supply to be 5,355 dwellings over the plan period. This leaves a total unmet need figure of 5,925 net dwellings.

MVDC recognise the difficulties in delivering sustainable growth and the challenge of effectively balancing competing environmental, social and economic pressures. Nonetheless MVDC are concerned that CBC will have an unmet need of approximately 5,925 net dwellings over the plan period (2020-2035). Based on the reasoning set out below, it is considered MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing need.

### Housing Market Area

CBC say there is already a long-established, effective joint working within the Northern West Sussex (NWS) Housing Market Area (HMA). The NWS HMA comprises Crawley, Horsham, Mid Sussex and a small part of Reigate & Banstead local planning authorities and does not include Mole Valley District.

Crawley's unmet housing need established from CBC's adopted Local Plan is being addressed by the combined adopted Local Plans within the NWS HMA. Currently the adopted Local Plans for Horsham and Mid Sussex are anticipated to provide an additional 3,150 dwellings above their objectively assessed housing needs, mostly to meet the unmet housing need arising from Crawley. CBC says that local plan reviews have acknowledged the 3,150 dwellings figure is

likely to change in particular because the 'standard method' for calculating local housing need increases the housing needs in Horsham and Mid Sussex above those established in their respective adopted Plans.

MVDC considers that as Mole Valley does not form part of the NWS HMA, the responsibility for meeting Crawley's unmet housing needs, in the first instance, would fall to those local planning authorities within NWS HMA.

#### Constraints, Green Belt and demonstrating Exceptional Circumstances

CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town.

Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by landscape and environmental designations, including the Surrey Hills Area of Outstanding Natural Beauty (AONB) and the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.

Mole Valley has published its Draft Local Plan (Future Mole Valley) for consultation between 3 February and 23 March 2020. It is clear from this draft plan MVDC cannot meet its own housing need on brownfield land and/or within the district's existing built-up areas. At this stage, MVDC has not identified any opportunities for part of Mole Valley's housing need to be met by neighbouring local planning authorities. Therefore, having fully explored all other reasonable options for meeting the district's housing need, exceptional circumstances may exist for MVDC to consider some degree of change to Green Belt boundaries. This is one of the principles which is being considered through MVDC's current Regulation 18 consultation.

Paragraph 137c of the NPPF 2019 says that before concluding exceptional circumstances exist to just changes to Green Belt boundaries, MVDC has to demonstrate it has examined fully all other reasonable options for meeting its identified need for development. This will include whether the strategy has been informed by discussions with neighbouring authorities about whether they could accommodate some of Mole Valley's identified need for development. Therefore where neighbouring local planning authorities, particularly those in the NWS HMA as they are not constrained by Green Belt boundaries, are capable of meeting their own housing needs then further discussions may be required about whether they could accommodate some of Mole Valley's housing need, to avoid changes to Green Belt boundaries, which both MVDC and the Government attach great importance to<sup>1</sup>.

#### Area Action Plan for Land North of Crawley

CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for housing, though CBC state housing development would be limited due to aircraft noise contours. CBC would commence work on the AAP after the adoption of the Submission Draft Crawley Local Plan 2035 which is

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<sup>1</sup> As indicated in Paragraph 133 of the NPPF 2019.

expected in December 2020<sup>2</sup> (notwithstanding the Planning Inspector's recommendations following independent examination of the Local Plan).

MVDC supports CBC in seeking to remove the current safeguarding. CBC should consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of housing which can be developed on land within the AAP boundary. It appears that the AAP could potentially contribute towards Crawley's unmet housing need. Without further assessment of land availability in the AAP, it is possible the level of unmet housing need arising from Crawley maybe overstated or non-existent.

## **Employment**

Joint working across Northern West Sussex (NWS) also resulted in a joint assessment of economic growth. The NWS Economic Growth Assessment (EGA) 2020 update recommends an identified need for a total of 33ha of employment land in Crawley based on the continuation of past development trends which in turn is based on a constrained land supply. However, Crawley's Employment Land Trajectory only identifies a supply of circa 12Ha, resulting in an unmet need of at least 21ha of employment land over the plan period. Furthermore, the EGA update 2020 also said there is potential for a greater level of business growth based on the 'unconstrained' local housing need figure of 752 dwellings per annum. Using this approach, the EGA identifies an 'unconstrained' employment land requirement of 113ha for Crawley. CBC consider this amount of employment land is likely to be needed should further major urban extensions to Crawley come forward.

It is considered, for the reasons set out below, MVDC is not in a position to be able to assist CBC in meeting its unmet employment needs.

### Functional Economic Market Area

The NWS EGA update 2020 concluded that NWS authorities (Crawley, Horsham and Mid Sussex) continue to operate as a broad functional economic market area (FEMA). The assessment also identifies that influential economic linkages also exist with Coastal West Sussex, Reigate & Banstead (e.g. Horley) and East Sussex. Mole Valley is not included within the NWS FEMA nor is the district identified as having influential economic influences with NWS authorities.

MVDC considers that as Mole Valley does not form part of the NWS FEMA, the responsibility for meeting Crawley's unmet employment needs, in the first instance, would fall to those local planning authorities within NWS FEMA and then subsequently, if necessary, those areas with which influential economic linkages exist, which doesn't include Mole Valley.

### Constraints

CBC say its adopted Local Plan is acknowledgement that there is very limited land within Crawley for accommodating further development because of the boroughs tight administrative boundaries; the historic Gatwick Airport 'safeguarded' land for a potential southern runway; physical constraints such as aircraft noise contours, flooding, nature conservation constraints, and; few infill opportunities due to the age and planned nature of Crawley New Town.

As stated previously, Mole Valley is also heavily constrained. 75% of the district is within the Metropolitan Green Belt and this includes land adjacent to Crawley's administrative boundaries. The district is also constrained by the Surrey Hills Area of Outstanding Natural Beauty (AONB), the Mole Gap to Reigate Escarpment Special Area of Conservation (SAC). As with Crawley, Mole Valley is also constrained by areas prone to flooding and aircraft noise contours

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<sup>2</sup> CBC's Local Development Scheme 2019 to 2022.

associated with Gatwick. In addition, transport links and public transport connections between Mole Valley and Crawley are weak.

#### Area Action Plan for Land North of Crawley

As mentioned previously, CBC proposes removing the 'safeguarding' of some 613ha of land for a potential southern runway at Gatwick Airport and preparing an Area Action Plan (AAP) for the future development of this land. The AAP will assess needs for future growth and operational needs of airport alongside other development needs arising in Crawley including for economic growth. CBC would commence work on the AAP after the adoption of their new Local Plan and CBC say this work may conclude sites for Strategic Employment Locations can be identified within Crawley should some or all of the land encompassed by the AAP not be required for airport expansion.

Given the AAP covers approximately 613ha and the unconstrained employment land need is 113ha, it appears that all of Crawley's employment needs can be met within the Borough with surplus land available within the AAP which can be used to meet other development needs, including housing. MVDC therefore supports CBC in seeking to remove the current safeguarding. CBC should also consider bringing forward preparation of this AAP to align with the Local Plan Review 2020-2035 in order to determine the amount of employment land that can be developed within the AAP boundary.

#### **Summary**

In summary:

- MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet housing needs.
- MVDC is not in a position to be able to assist CBC in meeting the boroughs unmet employment needs.
- MVDC supports the removal of safeguarding land for a potential southern runway at Gatwick Airport and supports the preparation of an AAP setting out the future development of this land to meet development needs arising in Crawley.
- CBC should consider bringing forward preparation of the AAP to understand the level of developments needs that can be accommodated within the AAP boundary.

Yours faithfully

*Jane Smith*

Jane Smith

Interim Planning Policy Manager

# Planning Policy

*By email*

Our Ref: CLP/19/0320

Date: 2 March 2020

Dear Strategic Planning,

**Crawley 2035 – Local Plan Review – Regulation 19 Publication, draft Sustainability Appraisal/ Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report**

Thank you for the opportunity to comment on the Regulation 19 Crawley Borough Local Plan 2020-35 (January 2020), draft Sustainability Appraisal / Strategic Environmental Assessment and Habitats Regulations Assessment Screening Report. We have the following comments.

Outstanding Evidence

We appreciate the need for swift adoption of the Local Plan Review to ensure that Crawley Borough Council (CBC) retains an up-to-date Local Plan in accordance with Paragraph 33 of the revised National Planning Policy Framework (NPPF). However, we think that it may be prudent to consider completion of further evidence before finalising and submitting the draft Local Plan for examination.

The Town and Country Planning (Local Planning) (England) Regulations 2012 (“the Regulations”), require at Regulation 19 Publication a copy of each of the “proposed submission documents” (and a statement of the representations procedure) to be made available in accordance with Regulation 35 of the Regulations.

As part of this publication, we have been invited to consider whether the Local Plan complies with legal requirements, the duty to co-operate and is sound. For reasons of

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**Manager: Lucinda Mould, Head of Places and Planning**  
**Town Hall, Castlefield Road, Reigate, Surrey RH2 0SH**

legal compliance, we are concerned that there are a number of key pieces of evidence that are key to assessing needs within the borough and identifying an appropriate strategy to meet the identified needs, that we would expect to be included as “proposed submission documents” to inform the Plan review which have not been made available. These include Plan viability; transport modelling; open space, sport and recreation; heritage; Gatwick sub-region Water Cycle Study and Strategic Flood Risk Assessment; and Gypsy and Traveller Needs Assessment. Given that these studies have not been made available, we and other specific and general consultees will not have had an opportunity to consider these evidence documents (save the Gatwick Water Cycle Study which we are jointly commissioning), nor how their findings may justify the strategy in the Plan to be submitted. Part of the test of soundness (NPPF Paragraph 35) is for the Plan’s strategy to be based on proportionate evidence.

#### Legal Compliance and Duty to Co-Operate

Section 33A of the Planning and Compulsory Purchase Act 2004 places a duty upon local authorities and other prescribed bodies to co-operate on strategic matters that cross administrative boundaries. In order to demonstrate compliance with duty to co-operate, Paragraph 27 of the revised NPPF states that “strategic policy-making authorities should prepare and maintain one or more statements of common ground, documenting the cross-boundary matters being addressed and progress in cooperating to address these”. It advises that “these should be produced using the approach set out in national planning practice guidance, and be made publicly available throughout the plan-making process to provide transparency”. Compliance with national policy, which includes the NPPF, is part of the test of soundness of a Local Plan.

As part of the Regulation 19 publication we note that no statements of common ground have been produced, and this Council has not been approached yet by CBC to produce one. This is contrary to Paragraph 020 Reference ID: 61-020-20190315 of the national planning practice guidance (PPG) which specifically advises that “authorities should have made a statement of common ground available on their website by the time they publish their draft plan, in order to provide communities and other stakeholders with a transparent picture of how they have collaborated”.

It also leads to questions regarding the soundness of the plan proposed. Paragraph 35 of the revised NPPF which outlines the tests of soundness states that for plans to be “positively prepared”, plans should provide a strategy which is informed by agreements with other authorities and that in order for plans to be “effective” they should be based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground.

Without statement of common ground(s) it is difficult to understand what the strategy will be to meet unmet needs in the borough, which again raises questions of soundness.

### Housing Needs

As part of this Regulation 19 Publication RBBC have been asked to formally confirm whether we can meet any of CBC’s unmet housing need.

Whilst we appreciate the challenges and constraints faced by CBC, we note that the scale of potential unmet housing need in the Regulation 19 Crawley Local Plan is significant. RBBC also faces considerable constraints, including significant extent of Green Belt, AGLV and flooding, which limits our own ability to accommodate growth. The constrained nature of our borough was acknowledged and accepted through Examination of our adopted Core Strategy (2014, reviewed 2019) which recognised that we were unable to fully meet our objectively assessed housing needs in a sustainable manner, giving rise to a shortfall of our own of 2,100-2,700 over our plan period. As such, whilst we are committed to maximising housing supply (as demonstrated through our recent delivery record and housing delivery test score), and to working together to understand how housing needs can be met as fully as possible, we are not in a position to accommodate any of Crawley’s identified unmet housing needs.

Whilst we appreciate that our Core Strategy recognises that migration between our respective boroughs (and beyond) would continue and be facilitated within the Core Strategy housing requirement of at least 460 dwellings per annum, we would reiterate that there is no specific quantified allowance for Crawley’s unmet needs within our adopted housing requirement.

Although there is an allowance within our housing requirement for between 90-130 dwellings to cater for net in-migration into the borough, there is no specific quantified allowance for in-migration from individual boroughs. Notably, the Strategic Housing Market Assessment (SHMA) used to inform our Core Strategy showed that the greatest numbers moving into RBBC were from Greater London and Tandridge, not Crawley. Given this position, to ensure that it is clear for readers that the strategy for meeting Crawley's unmet needs does not include allowances within RBBC's housing requirement, we request that Paragraph 2.27 of CBS's Regulation 19 Local Plan is amended to reflect the fact that there is no specific requirement within our adopted housing requirement to specifically cater for unmet needs within the Crawley / the North West Sussex Housing Market Area.

Similarly, in order to be explicit with regards to the strategy to meet Crawley / North West Sussex Housing Market Area unmet housing needs, we also request that Paragraph 2.30 of the Regulation 19 Crawley Borough Local Plan is amended to make it clear that the new neighbourhood level extensions to Horley (the adopted Sustainable Urban Extensions within RBBC's DMP) are to meet RBBC's housing needs and not Crawley / North West Sussex Housing Market Area unmet needs. We also note that Figure 2 below this Paragraph which refers to "Planned Development Adjacent to Crawley" depicts the Horley Strategic Business Park and not the adopted Sustainable Urban Extensions in / around Horley.

For reasons of soundness, we request that with regards to housing market areas, that Paragraph 2.26 of the Regulation 19 Crawley Local Plan is amended to accurately reflect only localised links between Horley and the North West Sussex Housing Market Area (and not our borough as a whole). Whilst we accept that there are some very localised linkages between Horley and the North West Sussex authorities, as defined in the 2008 East Surrey SHMA, RBBC forms part of an East Surrey HMA with Elmbridge, Epsom & Ewell, Tandridge and Mole Valley. As drafted, Paragraph 2.26 could be interpreted as suggesting a much greater degree of interaction between our housing market areas than the evidence supports.

Notwithstanding our position, more generally we support the strategy of neighbouring authorities accommodating Crawley's unmet need where they can deliver this near to the administrative boundary of Crawley (subject to sites being identified as suitable,

sustainability appraisal etc.). We also support the strategy of affordable housing provision in these areas being delivered to meet Crawley's affordable housing needs as otherwise Crawley's unmet affordable housing need (which the SHMA identifies as a substantial 739 dwellings per annum) may remain unmet as Crawley residents may be unable to qualify for affordable housing in adjoining boroughs.

### Housing Trajectory

We note that the Housing Trajectory includes a windfall allowance of 55 dwellings per annum for each year of the plan period. Whilst we recognise that this is the same provision as that currently included within Crawley's Local Plan (2015-2030), taking into consideration the tests of soundness, we question whether this windfall allowance is justified. Paragraph 70 of the revised NPPF states that "where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply" and that "any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends". We note that no evidence has been provided as to whether the current windfall allowance continues to be an appropriate level going forward (no evidence for example has been provided on previous levels of windfall delivery).

In relation to windfalls we also note that the January 2020 Strategic Housing Land Availability Assessment (SHLAA) identifies three potential sites as coming forward as windfalls: 46-48 Goffs Park Road; 102-112 London Road and 2-4 Tushmore Lane; and 116-136 London Road. We consider that these sites should all be excluded from any windfall allowance: the later two are identified as not currently available due to multiple landownership and the former is already included within the trajectory as an identified site to come forward within the plan period (we also question whether it should be included in the trajectory as it has uncertain landownership).

We also note that the Housing Trajectory includes a number of deliverable and developable "suitable SHLAA sites". We note that a number of the developable sites (such as Rear Gardens Dingle Close/ Ifield Road and Rear Gardens Snell Hatch/ Ifield Road) are included in the trajectory despite not being promoted for housing development. We question therefore, whether in line with the NPPF glossary, there is a reasonable prospect that these sites will become available for development at the

point envisaged. Whilst we appreciate the importance of identifying suitable sites as part of the SHLAA, we question whether they should be included in the trajectory as deliverable / developable sites and whether instead they should be treated as windfall sites.

### Gatwick Airport

#### GAT1 “Development of the Airport with a Single Runway”

We consider that the overarching strategy proposed in Policy GAT1 is sound. It is in line with the strategy in our Core Strategy (Policy CS9 “Gatwick Airport”) which the Core Strategy Inspector considered sound.

We agree that, as set out in proposed Policy GAT1 and Paragraphs 10.12 and 10.13, it is important that any future growth minimises the impacts of operation of the airport on the local environment and surrounding residents and that any future growth is supported by appropriate infrastructure and maximum benefits across surrounding authorities. In line with our own Core Strategy policy, we would therefore welcome reference in Policy GAT1 to the importance of joint working with neighbouring authorities and partners across the Gatwick Diamond through existing mechanisms such as Gatwick Officers Group to ensure that these shared strategic objectives are achieved for all.

#### GAT2 “Gatwick Airport Related Parking”

We strongly support the approach set out in this policy and consider that the proposed approach is sound. The proposed policy is aligned with our adopted DMP Policy TAP2 “Airport Car Parking” which our DMP Inspector considered sound, and reflects the long-standing, cross-boundary approach to the management of parking associated with the airport.

#### GAT3 “Employment Uses at Gatwick”

We strongly support the approach outlined in proposed Policy GAT3 and welcome the recognition within this policy and the supporting text of the importance of demonstration that new non-airport related commercial floorspace within the airport boundary will only be permitted where it can be demonstrated that it will not have an unacceptable impact on the role and function of town centres and employment areas beyond Crawley’s boundaries.

We consider that this approach is sound and in accordance with the sequential test for main town centre uses, seeking to ensure that the role of town centres and employment areas is not impacted by non-essential airport related office provision at Gatwick Airport.

### Safeguarded Land

We note that the draft submission Local Plan no longer proposes safeguarding land to the north of Crawley and south and east of Gatwick Airport for a potential future second runway. We note that instead Strategic Policy SD3 “North Crawley Area Action Plan” proposes designating this area for the preparation of an Area Action Plan which will commence within three months of the adoption of the Plan. The AAP will assess the needs for future growth and operational needs of the airport alongside other development needs arising in Crawley including economic growth, housing, infrastructure, community/ recreational facilities and any other uses identified through the evidence gathering and consultation on the Area Action Plan.

Whilst we understand that this is being proposed as CBC does not consider that there is, at this time, robust evidence within the draft Aviation Strategy, Aviation 2050, to continue the safeguarding of the land and that continual safeguarding is restricting the provision of land to meet economic, housing, infrastructure, community/ recreation and other needs, we have historically tentatively supported maintaining the safeguarded land in order to provide future flexibility for airport expansion (please note however that this should not be interpreted as Council support for a new southern runway).

### Economic Needs

We welcome the amendment requested at Regulation 18 stage to proposed Policy EC1 “Sustainable Economic Growth” which removes the hierarchy for delivering new strategic employment land. We remain committed to joint working on strategic employment needs, but this amendment removes potential uncertainty for residents living within RBBC.

We support in broad terms of the commitment in proposed Policies EC1 “Sustainable Economic Growth” and EC2 “Economic Growth in Main Employment Areas” to make best use of and intensify existing employment areas. We note that the intention of these policies is in line with our DMP Policies EMP1 “Principal Employment Areas”,

EMP2 “Local Employment Areas” and EMP4 “Safeguarding Employment Land and Premises”.

Thank you for the opportunity to comment earlier on a previous draft version of the Northern West Sussex Economic Growth Assessment Update as part of duty to co-operate discussions. We note that the study has identified a need for -1.1ha employment needs (baseline job growth scenario), 33.0ha past development rates scenario) and 113.0ha (baseline labour supply scenario) and that Lichfields (Paragraph 8.74 North West Sussex Economic Growth Assessment Update) considers that for Crawley “the baseline job growth scenario does not appear to provide a robust scenario for positively planning for future employment space” and “that the Council [should] consider planning to accommodate the past take-up based requirement as a minimum, to enable historically strong levels of employment development to continue in the Borough over the new plan period”.

The Regulation 19 Crawley Borough Local Plan therefore seeks as a minimum to provide employment needs in line with the past development rates scenario. When subtracting the available land supply pipeline, it is stated that this gives an outstanding business land need of 21ha. This outstanding business land need however does not take into account any employment needs that are proposed to be met on the Horley Strategic Employment Site, Policy HOR9 of RBBC’s Development Management Plan. In addition to helping to meet RBBC’s strategic office needs, the Horley Strategic Business Park was also allocated to help meet CBC’s unmet strategic office needs. Taking into consideration the 45,513sqm of CBC’s unmet strategic office needs proposed to be accommodated on the Horley Strategic Employment Site, we consider that there is no unmet need for office accommodation (surplus of 62,524sqm baseline job growth scenario; surplus of 69,884sqm past development rates scenario; and surplus of 40,279sqm labour supply scenario).

In relation to potential unmet need for industrial, manufacturing and distribution accommodation, given our policy position (i.e. an up-to-date Local Plan) we can confirm that we are not able to assist in meeting this unmet need. We note that one option proposed to meet the identified unmet manufacturing and distribution needs arising in the Crawley is to assess the future growth needs of the airport for the

safeguarded land to the north of Crawley and to the south and east of Gatwick Airport, and to determine whether the future growth needs of the airport require any, or all of the land. If not, it is proposed that a sustainable site/s within the area will be designated to accommodate strategic employment needs based on Crawley's unconstrained business land requirements. Should this land be designated for employment needs, to ensure the approach is justified / effective, we consider that this provision should be focussed to meeting Crawley's unmet strategic manufacturing, industrial and distribution uses.

### Retail and Town Centres

We support and consider that the town centre first approach proposed in Policy TC5 "Town Centre First" is sound. We note that it is consistent with national policy and the approach set out in our DMP (Policy RET5 "Development of Town Centre Uses Outside Town and Local Centres").

We note that for retail and town centre policies to be found sound, Paragraph 85 of the revised NPPF requires planning policies to define a network and hierarchy of town centres. This is defined in Paragraph 11.28 of the Regulation 19 Crawley Borough Local Plan<sup>1</sup>. We would welcome / question whether there is a need for greater clarity with regards to the policy position of neighbourhood centres. Paragraph 11.28 appears to suggest that neighbourhood centres will be treated as out-of-centre sites, however, criterion (b) of Strategic Policy TC5 "Town Centre First" appears to suggest that neighbourhood parades will be given the same policy weight as town centres. We note that the revised NPPF excludes neighbourhood parades from the town centre definition, but question whether in a Crawley context neighbourhood centres are considered as town centres and that the use of the word reflects the historic new town designation.

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<sup>1</sup> "For the purposes of policy interpretation, for retail uses Town Centre sites are defined as those locations falling within the Primary Shopping Area as identified on the Local Plan Map. Sites falling outside of the Primary Shopping Area, though within the Town Centre Boundary, are defined as edge-of-centre sites and these are the next most sequentially preferable sites. All locations beyond the Town Centre Boundary, in retail terms, represent out-of-centre locations".

If neighbourhood centres within Crawley are not given the same policy position as town centres, to be in accordance with the revised NPPF “town centre first” approach, we consider that there is a need to amend Strategic Policy TC5 to ensure that centres within other authorities in the retail catchment of proposals (for example town centres in RBBC) are given the same policy position as town centres in CBC.

We also question whether Strategic Policy TC5 criterion (b) should be amended – in accordance with Paragraph 89 of the revised NPPF – to take into consideration the impact on local consumer choice and trade as part of the impact on town centre vitality and viability. Whilst we note that Paragraph 11.35 advises that the retail impact assessment should take into consideration forecast trade draw, given the decision in *Cherkley Campaign Ltd, R (on the application of) v Mole Valley District Council and Anor [2014]* confirmed that the supporting text to a policy does not have the same weight as policy, we suggest that this requirement would be better included within the policy.

Similarly, we note that a retail impact threshold of 500sqm is proposed in Paragraph 11.34. We welcome and support the introduction of a lower retail impact threshold than the national standard to support / protect town centres and note that our adopted DMP includes a retail impact assessment threshold of 150sqm for comparison retail and 250sqm for convenience retail. Given the above appeal decision we suggest that this requirement would be better included in a policy rather than the supporting text.

#### Gypsies, Travellers and Travelling Showpeople

RBBC note that CBC is currently in the process of updating its 2014 Gypsy & Traveller Needs Assessment. We note that the current, 2014, Gypsy, Traveller and Travelling Showpeople Assessment identifies a potential need for up to 10 pitches and that this is the need that is currently being planned for in the Regulation 19 Crawley Borough Local Plan. We suggest that you may wish to consider the soundness of a proposed submission Local Plan policy “reserve” allocation, based on outdated evidence.

We note that the 2014 study sought to meet the needs of the Gypsies, Travellers and Travelling Showpeople as defined in the National Planning Policy for Traveller Sites. The current National policy is from August 2015, postdating CBC’s current evidence on G&T housing needs. Our DMP makes provision to meet the needs of households

who meet the National Planning Policy definition of “Traveller”, and also those who meet the wider equalities definition, and those for whom it was unclear. We would therefore urge CBC to also seek to meet the needs of both definitions in order to ensure that the needs of this wider group are properly planned for in accordance with the public sector equalities responsibility.

Should the updated G&T needs assessment study identify a greater need for Gypsy, Traveller and Travelling Showpeople than that currently being planned for, in order for the plan to be “justified” based on an appropriate strategy, and therefore sound, further sites may need to be identified to meet this updated need, a process which would require Main Modifications to be made to the proposed submission plan.

Whilst we note that proposed Policy H8 “Gypsy, Traveller and Travelling Showpeople Sites” allows windfall sites to come forward, subject to a criteria based approach, opportunities in the borough may be few given the land constraints and high land values.

We appreciate the land constraints within CBC, however, we would like to reiterate that whilst our DMP has sought to meet our pitch and plot needs through site-specific allocations and as part of wider housing/ employment/ community development on our Sustainable Urban Extensions, there is no surplus available to accommodate any potential unmet needs from CBC.

### Strategic Policies

We note that from the table on page 10 of the Regulation 19 Crawley Borough Local Plan that adoption is anticipated for December 2020. Paragraph 22 of the revised NPPF advises that “strategic policies should look ahead over a minimum 15-year period from adoption (except in relation to town centre development), to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure”. Should the anticipated adoption slightly slip, the strategic policies in the plan will not look ahead over the minimum 15-year period.

### Draft Sustainability Appraisal/ Strategic Environmental Assessment

We note that given that the Regulation 19 Crawley Borough Local Plan is largely a review of the current Crawley Local Plan, CBC have sought largely to only review the

previous SA / SEA conclusions, update where changes are proposed, and where new options are proposed consider these.

We recognise that the only policy that identified a potential negative impact is GAT2 “Gatwick Airport Related Parking”. As stated previously in this response, this policy is in line with Policy TAP2 “Airport Car Parking” in our adopted DMP and we support this approach and consider that it is sound as it reflects the historic and cross-boundary policy position to meet airport car parking needs.

More generally we have the following comments:

Measurability of criteria/ objectives: Whilst we appreciate that this is only a review of the current SA/ SEA, from reading the document there appears to be limited specificity with regards to the criteria and objectives used to assess the options.

Evidence: It is recognised that a number of evidence studies are still being finalised, the findings of these studies will need to be taken into consideration in an update to the SA/ SEA.

Paragraph 3.7: Incorrectly states that CBC has a 9.59 year land supply position, the Housing Trajectory produced to accompany the consultation identifies a land supply position of 5.80 years.

Paragraph A32: We question whether this paragraph should be amended to reflect the fact that as local authorities we work together to measure/ monitor/ mitigate air quality issues.

Paragraph C11: We note that the mix identified for affordable housing is different to that identified in Paragraph 13.14 of the Regulation 19 Crawley Borough Local Plan.

Paragraph C11: We note that only 0.5% of 4-bedroom properties have been delivered despite a need for 5%/5-10%. We are currently in the process of preparing a Affordable Housing SPD, as part of this our Housing Services Team suggested that we should require 3-bedroom accommodation to be provided as 3b6p accommodation not 3b5p as some of the need for 4-bedroom properties is due to families with three children not being able to be housed in 3b5p houses.

Paragraph D5: Recognises that “the allocated Horley Business Park in RBBC will help to meet some of Crawley’s unmet business land needs”, this however isn’t reflected in the economic growth options.

Policy H5: Affordable Housing: We note that Option 4 “40% affordable housing with no threshold” has been identified as the “chosen option”. Whilst we recognise the need for affordable housing, we note that this is contrary to national policy which states that “the provision of affordable housing should not be sought for residential developments that are not major developments” (Paragraph 63 revised NPPF). Major developments are defined in the revised NPPF as sites “where 10 or more homes will be provided, or the site has an area of 0.5hectares or more”.

We note that the options include only the provision of either 30% or 40% affordable housing with/out a threshold. No rationale for these options is provided. The 40% threshold is a continuation of the current Local Plan policy. No testing of a higher percentage requirement/ rationale for not including a higher percentage threshold.

Policy H1: Housing Provision: It is noted that five options were tested:

- Option 1: Housing requirement of 1,848dpa based on identified affordable housing need of 739dpa (i.e. total housing required to meet need on basis of 40% affordable housing provision)
- Option 2: Housing requirement based on Government’s standard method for calculating housing need, excluding the cap (752dpa)
- Option 3: Housing requirement based on Government’s standard method for calculating housing need, including the cap (476dpa)
- Option 4: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15)
- Option 5: Supply-led locally determined housing requirement (minimum of 357dpa 2020-2035 stepped as a 500dpa requirement years 1-5; 450dpa years 6-10; and 121dpa years 11-15) with ‘unmet need’ expressed.

and that Option 4 was identified as the “chosen option”.

Following our comments on the affordable housing appraisal, we note that no options were considered to deliver the full amount of affordable housing with a different percentage requirement.

More generally we note that some of the commentary is quite general/ includes untested statements such as for Option 1 “housing delivery at this level would be well beyond what has been achieved in recent years, suggesting that market factors and the capacity of the construction industry are likely to prevent delivery at this level, which would involve excess provision of market housing ... kit is also a level unlikely to be met or sustained by the housing industry (with annual delivery levels traditionally averaging around a quarter to a third of this)”.

#### Habitats Regulations Assessment Screening Report

RBBC recognises that for the 2015 Local Plan, evidence was gathered to demonstrate that the possible effects of the local plan would not have a significant impact either on their own or “in-combination” with other plans on the three European Sites within 15km of CBC. We understand that due to the findings of the Lewes and South Downs Joint Core Strategy 2017 Legal Challenge in relation to how “in-combination” effects are considered that CBC will do further work to understand the possible impacts on the European sites arising from the Regulation 19 Crawley Borough Local Plan and “in-combination” with other plans.

We suggest that when considering the findings of the 2015 Habitats Regulations Assessment Screening Report, consideration is given to the ‘People over Wind’ judgement<sup>2</sup> which clarified that when making screening decisions for the purposes of deciding whether an Appropriate Assessment is required, competent authorities cannot take into account any mitigation measures.

We note that Paragraph 5.6 states that “the following authorities have considered/ are considering the Habitat Regulation Assessment requirements as part of their plan-making processes in light of the legal judgement in relation to the “in-combination” effects ...”. As part of the preparation/ examination of our DMP, we also took into consideration “in-combination” effects. We then undertook an Appropriate Assessment which included consideration of the potential changes in air quality from

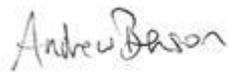
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<sup>2</sup> Case C-323/17 People Over Wind and Peter Sweetman v Coillte Teoranta (‘People Over Wind’)

the “in-combination” effects on predicted traffic. It then assessed mitigation measures to protect the foraging habitat referred to as a ‘functional linkage’ of Bechstein’s bats surrounding the Mole Gap to Reigate Escarpment SAC. The Appropriate Assessment concluded that the DMP would not result in any adverse effect on the integrity of any European designated site within 15km of the borough boundary either alone or “in-combination” with other local authorities.

We hope that you find these comments helpful. Should you have any queries, please do not hesitate to contact us. We are very happy to discuss any of the points raised above in more detail.

Yours faithfully,

A handwritten signature in black ink that reads "Andrew Benson". The signature is written in a cursive, slightly slanted style.

**Andrew Benson**

Head of Planning

Phone: Strategy Team on 01883 722000

E-mail: [localplan@tandridge.gov.uk](mailto:localplan@tandridge.gov.uk)

03 February 2020

Dear Elizabeth,

Many thanks for getting in touch. The Council ("Tandridge District Council") continue to welcome the ongoing co-operation with Crawley Borough Council (CBC) and the Statement of Common Ground of December 2018 between our two authorities remains entirely relevant. We recognise that matters have progressed, particularly in plan-making terms, since then and we would be happy to see this updated to reflect the current position. That said, however, the Tandridge District Council (TDC) position in terms of our ability to assist you in meeting development needs has not altered from the point of signing.

#### *Housing Market Area (HMA)*

The Council continue to be of the view that Crawley forms part of the wider Northern West Sussex housing market area, which extends to include Horsham and Mid Sussex, and to a lesser extent Reigate and Banstead (particularly in relation to Horley). Whilst the Housing Market Area element of the Council's Strategic Housing Area Assessment (SHMA) has not been recently updated, we still believe that there is no fundamental links between Tandridge and Crawley in housing terms but continue to recognise Crawley as part of a much wider Housing Market Area which shares some functional components. This continues to be accurately reflected in the current Statement of Common Ground.

#### *Housing Need Calculations*

In terms of the detailed housing position and calculation for CBC set out in your letter of 21 January 2020, we will not comment and trust that CBC will have extensively explored its housing need and have still arrived at a housing figure it is unable to meet due to the constraints of your borough. However, TDC is not able to assist in this and indeed at the time of writing, is at the post hearing stage of our own Local Plan which demonstrates that we are unable to meet our own housing needs, in full and is relying on 'step-change' spatial strategy in Tandridge which will see higher levels of development in the area than ever before.

Due to significant green belt, landscape and infrastructure constraints TDC has a shortfall in the local housing need and in a similar situation to neighbouring districts and boroughs across the South East, we have been unable to find an alternative authority, including Crawley to assist us. In fact TDC has only been able to come close to meeting its own needs through the allocation of a Garden Community for 4,000 homes at South Godstone which is reliant on upgrades to its rail service as well as both junction 6 of the M25 and the Felbridge Junction on the A22. It is anticipated that the road junctions can be done with the assistance of a successful bid to the Housing Infrastructure Fund (HIF), without which our ability to come close to meeting our local needs for all development, will be difficult.

## *Employment & Gatwick*

In terms of employment, the Council has, through its Local Plan, been able to secure sufficient B-Class employment by making the best use of existing sites. Whilst we have ensured there is some flexibility in the employment land supply by around 6ha all of our identified sites, barring the Strategic Employment Sites, are within the Green Belt and schemes may not be delivered. However, we are confident that our need of 15.4ha, can be achieved. It is recommended that this is kept under review as part of the ongoing 'Duty' discussions and recognises the CBC approach to an AAP. Given the potential changes to operations and expansions at Gatwick we support all of these matters continuing to be considered as part of the ongoing joint working regarding Gatwick intended expansion which will inevitably have implications for economic development, housing and infrastructure for a number of authorities.

I hope this is useful, but should you wish to discuss the matter further or look to revise and agree an updated Statement of Common Ground, please contact me.

Yours sincerely,

*SL Thompson*

Sarah Thompson  
Head of Strategy