Consultation Statement

January 2023

Crawley Borough Council

This document has been prepared in accordance with:

- ⇒ The Town and Country Planning (Local Planning) (England) Regulations 2012
- ⇒ Crawley Borough Council Statement of Community Involvement: A guide to participating in the planning system (June 2020)

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1. Introduction

1.1 This document (the "Crawley Local Plan Consultation Statement") is prepared to demonstrate the process of involvement in the preparation of the Local Plan. It summarises the methods used by the council to invite engagement and the feedback received from the consultation. The consultation materials and verbatim representations are provided in the appendices.

1.2 The Local Plan is a document that outlines how the town should be planned and developed over a 15 year period following its adoption. Formal consultation is a key part of Crawley Borough Council's Local Plan Review process. Engagement throughout the Local Plan preparation is undertaken with people living and working in Crawley, and those with particular interests, to better understand how they think the town should develop.

1.4 The main stages of public consultation are established by the council's adopted Local Development Scheme[1], in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012[2] and the council's adopted Statement of Community Involvement (SCI)[3].

1.3 The council commenced its review on the current Local Plan in 2018.

1.4 Three earlier formal stages of public consultations have been undertaken between:

- July and September 2019 (Early Engagement);
- January and March 2020 (Initial Publication Consultation); and
- January and June 2021 (an extended Additional Publication Consultation).

1.5 A further consultation exercise is being held to see what people think of its draft future policies. This period of consultation forms a third stage of the statutory 'Publication' consultation for the Local Plan Review.

Consultation Period(s)	Date
Early Engagement Stage (Regulation 18)	
Issues, Options and Preferred Approach Public Consultation	15 July 2019 – 16 September 2019
Publication Stage (Regulation 19)	
Initial Publication Consultation	20 January 2020 – 2 March 2020
Additional Publication Consultation	6 January 2021 – 30 June 2021
Further Publication Consultation	9 May 2023 – 20 June 2023

1.6 Publication Consultation (in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012) is the 'final' stage of consultation undertaken on what the council considers to be its

[1] Local Development Scheme 2022 – 2025 (December 2022) CBC: https://crawley.gov.uk/planning/planning-policy/engagement-and-monitoring/local-development-scheme
[2] Town and Country Planning (Local Planning) (England) Regulations 2012: http://www.legislation.gov.uk/uksi/2012/767/contents/made
[3] Crawley Borough Council Statement of Community Involvement: A guide to participating in the planning system (June 2020) CBC: SCI June 2020

"Sound" Local Plan for the purposes of submission to the Secretary of State for independent examination.

1.7 This further stage of Publication Consultation being carried out for the Local Plan reflects key changes to the Local Plan due to the delays and new policy requirements created by the need to secure water neutrality for developments within the Plan period[4].

[4] For more information on how Water Neutrality as affected planning in Crawley, please visit: Water resources in Crawley | Crawley GOV

2. Early Consultation Stage (Regulation 18)

2.1 The first stage in the council's adopted SCI is called "INVOLVE". This is considered to be a vital stage to ensure that stakeholders are central when developing the key themes and general direction of the Plan as well as developing policy options. An extract from the adopted SCI is below:

INVOLVE	*Stage one – early engagement*
	Gather evidence, including independent studies and advice, to input and support production of the document. Notify and work with people, groups and other organisations to identify the key issues that need to be addressed by the plan. Engagement will be in a variety of different forms to include targeted stakeholder and general public consultation, and a list of interested parties will be maintained to ensure people are aware of consultation. Consider if issues identified can be addressed by the plan and make available feedback to show how responses have been considered. For Development Plan Documents, additional consultation may be undertaken to invite feedback on the council's preferred approach. This will have been drafted taking into account all comments submitted at early engagement.

2.2 This stage of the SCI closely relates to Regulation 18 of the 2012 Local Planning Regulations. Therefore, any consultations that occur at this stage satisfied both the requirements of the SCI and Regulation 18.

Early Engagement Consultation's Aims

2.3 The aims of the 'early engagement' formal public consultation were:

1. To meet the statutory requirements as set out in the Regulations and to conduct the consultation in line with the Statement of Community Involvement.
2. To verify that the strategy outlined in the early engagement draft Local Plan has support, and provide people the opportunity to raise queries and objections.
3. To afford those living and working in the borough the opportunity to be involved in the strategic planning process.
4. To share with stakeholders and residents some of the challenges facing the council at the current time and into the future.
5. To gather detailed qualitative responses to the early engagement draft Local Plan that can help inform amendments as we work towards our Submission Draft Local Plan.

Who we consulted

2.4 In advance of the formal stage of public consultation, as part of the preparation of the draft Consultation Plan, engagement with a range of technical experts and partners had already taken place. These included:

Crawley Borough Council Officers	External Partners & Key Stakeholders
Environmental Health	West Sussex County Council: including Strategic Planning, Local Education Authority and Public Health;
Economic Regeneration	
Development Management	
Sustainability	Neighbouring Authorities as part of Northern West Sussex Housing Market Area, Gatwick Diamond authorities, Gatwick Officers Group, and West Sussex and Greater Brighton
Community Development	
Amenity Services	
Property	Crawley Health and Wellbeing Board
Waste Services	Crawley CCG
Drainage	Gatwick Airport Limited
Housing	Southern Water
Crawley Homes	Sussex Biodiversity Record Centre
Deputy Chief Executive	Major Landowners

2.5 The formal public consultation, carried out between July and September 2019, was open for the involvement and engagement for all who have an interest in Crawley borough. This included those who live, work and visit the town, as well as investors, businesses, landowners, developers, neighbouring authorities and interest groups (national, south east England, Sussex and local).

2.6 Those self-registered on Crawley Borough Council's Planning News Alert service were notified by email, on three occasions:
- → at the start of the consultation;
- → at the mid-point of consultation; and
- → a final reminder with one week to go before the end of the consultation.

2.7 Those notified through the Planning News emails included statutory consultees, developers, stakeholders, interest groups, and individual residents. In addition, notifications were sent out in relation to the Local Plan consultation to those people signed up to Community and Neighbourhood News Alerts.

2.8 Furthermore, individuals, organisations and stakeholders were also targeted directly through a range of methods, including social media and exhibitions and events.

How the consultation was conducted

2.9 The early engagement consultation was undertaken over an extended two month consultation[5], in order to take account of the summer holiday period. Workshops and meetings took place after the summer holidays in September.

2.10 The council published the following Consultation Draft Documents for scrutiny and comment:
- Crawley 2035: Draft Consultation Crawley Local Plan 2020 – 2035 (July 2019)
- Sustainability Appraisal/Strategic Environment Assessment Scoping and Draft Report
- Habitat Regulations Assessment Screening Report
- Draft Consultation Statement
- Draft Infrastructure Plan.

[5] 15 July until 16 September 2019

2.11 These were available online on the council's dedicated website: **crawley.gov.uk/crawley2035**. This could also be accessed via a QR code available on all consultation documentation. Paper copies could be viewed at the Town Hall and Crawley Library, during normal office hours.

2.12 A high level Questionnaire was made available online and in paper format.

2.13 A public display was located in Crawley Town Hall reception area over the entire consultation period, during the normal office opening hours. This provided details of the public consultation and how people were able to engage and respond.

2.14 A manned exhibition was also held:
- → at the Town Hall on two full working days at the start and mid-consultation period;
- → at Crawley Library on two after-work evenings (up until the Library closing time of 7pm);
- → at K2 Crawley between 3pm and 8pm in order to capture visitors and residents using the leisure centre, including those people attending classes, as well as local residents; and
- → at County Mall on two Saturdays, at the start and later on in the consultation, to capture working residents and visitors to the town's sub-regional retail offer.

2.15 The council engaged in existing forums and meetings where this was possible, this included the Young People's Council; Local Economy Action Group; the Town Access Group and the Manor Royal BID Management Group.

2.16 Representatives from relevant local and particular interest groups were invited to attend a Community Forum workshop. Each neighbourhood forum and Conservation Area Committee was notified of the consultation and invited to the Community Forum.

2.17 A Developer and Business Forum was set up, with over 100 different contacts, and a workshop was held.

Consultation Materials & Media

2.18 The following consultation materials were used to maximise the engagement opportunities and raising awareness of the consultation:
- → Formal press notice - Crawley Observer: Statement of Representation Procedure and Notification of Public Consultation;
- → Local press releases;
- → Posters on neighbourhood noticeboards;
- → Council Magazine 'Crawley Live';
- → Leaflets;
- → Local Plan Policy Questions;
- → Questionnaire;
- → Investor Newsletter Item;
- → Online via Crawley Borough Council website, Facebook and Twitter.

2.19 Wherever possible, images, maps and infographics were used to simplify complex and detailed messages and increase the accessibility of the Local Plan process.

2.20 The use of social media was capitalised, including through the council's main Facebook page, which offered opportunities to link into existing local forums' own pages and reach Crawley residents and individuals in an alternative form.

The use of Facebook provided opportunities to highlight specific issues and matters throughout the consultation period, and gather feedback through comments made and discussions generated on these issues.

2.21 Due to the desire to secure maximum feedback and engagement, the data requirements of the consultation were more flexible than the Regulation 19 stage of consultation will have to be. Names and address were not requested from responses, in order to limit concerns regarding privacy and data collection.

2.22 If representors wished to keep updated and informed of the Plan as it progresses, they were invited to self-register for the Planning News Alert service. This would be used throughout the consultation, and following the close of consultation as the Plan progressed, to provide updates on the preparation of the Plan.

Events

2.23 Manned exhibitions were successful in providing those who were informed about the Local Plan the opportunity to discuss more detailed aspects of the 2035 Plan with council officers and also to raise awareness with other residents and visitors who were otherwise unaware of the Local Plan or the public consultation. Feedback was gathered instantly through noting discussions with individuals, and also through distribution of leaflets and questionnaires in the anticipation that the discussions held at the exhibition would generate a desire to more formally engage.

County Mall

2.24 Two exhibitions were held in County Mall on Saturdays during the day:

1. Saturday 27 July (10am – 4pm)
2. Saturday 17 August (10am – 4pm)

2.25 In total, 269 number of people attended and engaged. On 27 July: 94 people in total spoke to officers, and a further 27 people observed and took leaflets; on 17 August: 113 people spoke to officers and a further 35 people observed and took leaflets. This included local residents and representatives from residents and ‘friends of’ groups who had received the Planning News alert.

Town Hall

2.26 Two exhibitions were held in the Town Hall during the normal working day:

1. Monday 29 July (10:30am – 4pm)
2. Monday 19 August (10:30am – 4pm)

2.27 In total, 24 individual people attended and engaged. On 29 July: four people in total spoke to officers, and a further two people observed and took leaflets; on 19 August: 18 people spoke to officers. This included representatives from businesses already engaged in the Local Plan Review process and local residents who came specifically to discuss issues in more detail. Matters which were discussed included Gatwick Airport, and proposals from Homes England to create urban extensions to Crawley on land to the west of Ifield.

Crawley Library

2.28 Two exhibitions were held in Crawley Library:

1. Tuesday 6 August (5pm – 6:50pm)
2. Monday 9 September (5pm – 6:50pm)

2.29 In total, 65 number of people attended and engaged. On 6 August: 25 people in total spoke to officers, and a further nine people observed and took leaflets; on 9 September: 30 people spoke to officers and one additional person observed

and took leaflets. This included local residents and representatives from residents and 'friends of' groups who received the Planning News alert and updates from the Community Development team reminders using social media. Matters which were discussed included Crawley's growth and population, Gatwick Airport, green spaces and infrastructure capacity.

K2 Crawley

2.30 One exhibition was held at K2 which extended into the evening:
1. Monday 5 August (3pm – 8pm).

2.31 In total, 70 number of people attended and engaged: 53 people in total spoke to officers, and a further 17 people observed and took leaflets. This included local residents who had received notifications from the Planning Alert and individuals from outside of the borough boundary (including from Rusper/Ifield, Pease Pottage and Cuckfield).

Developer Forum

2.32 23 people attended the Developer Forum held on 5 September. These each represented separate individual businesses (landowners, businesses, agents, developers).

Community Forum

2.33 12 people attended the Community Forum held on 5 September. These represented a range of organisations, including NHS Crawley, residents groups, special interest groups such as homelessness, mental health and cultural groups.

Summary of Representations Received

2.34 Comments were gathered in various formats to maximise returns and responses to the Plan and gather as much feedback as possible in relation to opinions on Crawley and its future. This included through the online survey, the paper questionnaire, notes made by officers of comments made at the exhibitions, emails, and formal letters.

2.35 A total of 210 representors provided comments on the Local Plan and supporting documents. This included receipt of 13 paper questionnaires, 63 completed online surveys, email submissions from 50 businesses, organisations, authorities and agencies (including from four neighbouring district/borough councils, both West Sussex and Surrey County Councils, a neighbouring Parish Council, Historic England, Environment Agency, Sport England, Department for Education, Natural England and NHS Property Services) and emails and letter from nine local residents, alongside the comments collected by officers made by individuals attending the exhibitions (17 at K2 Crawley; 34 at County Mall; four at Crawley Town Hall; and 20 at Crawley Library).

a. Local Plan

2.36 Comments received through this consultation were varied. Key messages received from the feedback on the Local Plan and changes made to the Plan as a result have been summarised below according to Chapter. Full representations and officer responses can be found in Appendix 2 of this report.

Main Issues	How this was taken into account?
General: *Comments were received from 27 individuals, businesses and organisations on general matters, the consultation process itself, viability, and the overarching issues relating to the Local Plan, including Duty to Cooperate, the Local Plan Map, other Development Plan Documents, and the Local Plan's Vision and the Spatial Context.* *This included comments from Mid Sussex District Council, Horsham District Council, West Sussex County Council, Environment Agency, Sussex Wildlife Trust, agents on behalf of landowners, Gatwick Airport Limited, Sussex Ornithological Society, Department for Education, Manor Royal BID, Home Builders Federation, Historic England, Sport England and local residents.*	
• Need for the policies to be simpler and avoid duplication. • Support for the Vision. • Importance of, and support for, continual and effective Duty to Cooperate. • Importance of viability testing of the Plan as a whole Plan, including ensuring developer engagement, taking a cautious approach to land value and benchmark values as well as when using BCIS data, fees and finance, profit and policy requirements including concern of biodiversity net gain. • Highlighting the importance of linking with the County's Minerals and Waste Planning. • The need to safeguard land for the provision of new schools and school expansions and securing developer contributions for education, as well as Free School projects. • Concern with the use of the "At Crawley" study area.	The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies. Amendments have been made to remove unnecessary duplication and clarify purpose of the character and design policies. The preparation and inclusion of a Planning Obligations Annex makes clear up front the implications for developers of some of the policies in the Plan. The Whole Plan and CIL Viability Assessment is currently in the process of being commissioned. The purpose of the "At Crawley" plan has been clarified and the key has been amended for the avoidance of doubt of its intentions.
Sustainable Development: *Comments were received from 22 individuals and organisations on the Sustainable Development chapter of the draft Local Plan Review. These included 12 responses to the set survey questions. In addition to these, detailed comments were received from 10 organisations and businesses, including from Sport England, Historic England, The Woodland Trust, CPRE Sussex, Environment Agency, The Ifield Society, the Town Access Group and two agents on behalf of developer/landowners.* *Representations in general supported the two policies in this chapter. However, changes were suggested in terms of highlighting specific features, constraints and opportunities, and also challenging the policy weight placed on developers.*	
• General support for the sustainable development and well-being policies. • Strengths of Crawley include facilities, transport links (including Gatwick), balance demographic, vibrancy, good parks and leisure facilities. • Weaknesses of Crawley include maintenance, air and noise pollution, cycle network. • Concerns raised regarding health services, and particularly capacity of GP provision. • Strong support for the bus network – need to extend spatially and time (to support night-time economy). • Promotion of including water quality and water resources into Sustainable Development policy. • Promotion of including wildlife, heritage and sports into Healthy Lifestyles and Wellbeing policy.	Amendments have been made to detailed policies to address matters and suggestions raised.

Main Issues	How this was taken into account?
Character & Design: *Comments were received from 36 individuals and organisations/businesses on the Character & Design Chapter. These included comments from seven individuals at the events and 12 responses to the set survey questions. In addition, detailed comments were received from 17 organisations and businesses, including from the Town Access Group, Sport England, Historic England, Home Builders Federation, Sussex Ornithological Society, Gatwick Airport Limited, West Sussex County Council, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Mid Sussex District Council, four agents on behalf of developer/landowners and Natural England (received late due to technical issue).* *Specific comments were received on every policy in this Chapter (Policies CD1, CD2, CD3, CD4(a), CD4(b), CD5, CD6, CD7, CD8, CD9, CD10 and CD11) as well as general observations on the character and design of Crawley.*	
• Density and Design/Character policies generated debate, with both positions of support and objection being received from both residents and developers. • Support for strategic urban design and integrated landscaping policies. • Concern of confusion, contradiction and repetition of some of the policies in this chapter – clarity being requested from agents acting on behalf of landowners/developers. • Concern raised in relation to the implementation of the transport and access approach. Support received for encouragement of active design and travel. • Detailed questions were raised in relation to the application of the Density Policy, along with some support received and some objections. • Concern of over-prescription in relation to character assessments and design tools from agents acting on behalf of landowners/developers. • Objection from Home Builders Federation to continuation of Building Regulations Part M4(2) – accessible and adaptable for all new dwellings, and support for accessible and inclusive design from the Town Access Group. • Detailed comments provided on Crossover, Advertisement and Aerodrome Safeguarding policies. • Suggestions include inclusion of wording relating to open space, landscaping and ecological networks.	The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies. Amendments have been made to remove unnecessary duplication and clarify purpose of the character and design policies. Amendments have been made to the density levels. Disagree in relation to the objections to the “accessible and adaptable” dwellings – this is an adopted Policy and the evidence in the Strategic Housing Market Assessment supports its continuation. It will be included in the viability assessment. Amendments have been made to detailed policies to address matters and suggestions raised.
Landscaping & Landscape Character: *Comments were received from 32 individuals and organisations/businesses on the Landscape & Landscape Character Chapter. These included comments from six individuals at the events and 10 responses to the set survey questions. In addition, detailed comments were received from 17 organisations and businesses, including from Thames Water, High Weald AONB Unit, West Sussex County Council, Historic England, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group, Mid Sussex District Council, five agents on behalf of developer/landowners and Natural England (received late due to technical issue).* *Specific comments were received on paragraph 5.18 and on every policy in this Chapter (Policies LC1, LC2, LC3, LC4, LC5 and LC6) as well as general observations on the landscape character of Crawley.*	
• Concerns raised around designations impacting on future development potential and landowner concerns. • Strong support for the borough’s existing soft landscaping. • Support for the tree retention and replacement policy,	The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies. Amendments have been made to detailed

Main Issues	How this was taken into account?
as well as concern regarding the method of its calculation and the need to consider it as part of viability assessment. • Concern that the land outside the built-up area boundary should not be considered unsuitable for development – issues of safeguarding and gap between Crawley and Gatwick Airport raised by agents working on behalf of landowners of sites within this area. • Comments made on the High Weald Area of Outstanding Natural Beauty policy and links to the Management Plan priorities.	policies to address matters and suggestions raised. Amendments to the High Weald AONB policy have been made and greater reference in the supporting text to the Management Plan context. A new plan has been introduced to the document, to show the small area of AONB within Crawley at a closer scale, to highlight the key planning policy designations within this area.
Heritage: *Comments were received from 21 individuals and organisations/businesses on the Heritage Chapter. These included comments from two individuals at the events, one resident via email and 10 responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from Sussex Gardens Trust, Council for British Archaeology South-East, Surrey County Council, Historic England, The Woodland Trust, Sussex Wildlife Trust, the Ifield Society and one agent on behalf of developer/landowner.* *Specific comments were received on paragraphs 6.1-6.4, 6.7/6.8 and Policies HA1, HA2, HA3, HA4 and HA6 as well as general observations on Crawley's heritage.*	
• Recommendations to make more explicit reference to archaeological assets. • Support for the heritage policies with recommendations on detailed wording in Heritage Assets, Conservation Areas, Listed Buildings and Historic Parks and Gardens policies. • Links between trees and ancient woodland as heritage, biodiversity and landscape assets.	Detailed amendments made to the chapter and policies to address comments and suggestions received. A new archaeology policy has been introduced. Links have been made in relation to trees and ancient woodland and their heritage value, and cross-reference made to the biodiversity policy.
Open Space, Sport & Recreation: *Comments were received from 30 individuals and organisations/businesses on the Open Space, Sport & Recreation Chapter. These included comments from 12 individuals at the events, one resident via email and 10 responses to the set survey questions. In addition, detailed comments were received from seven organisations and businesses, including from The British Horse Society, Sport England, West Sussex County Council, The Woodland Trust, Sussex Wildlife Trust, the Ifield Society and one agent on behalf of developer/landowner.* *Specific comments were received on paragraphs 7.15-7.17 and on every policy in this Chapter (Policies OS1, OS2 and OS3) as well as general observations on Open Space, Sport and Recreation provision and protection.*	
• Strong support for the borough's parks and open spaces. • Requests to strengthen policy wording in relation to public rights of way and multi-use routes. • Comments received regarding need to maintain, protect and enhance use of accessible semi-natural greenspace provision. • Requests for indoor sports facilities including skating rinks and bowling alleys and disabled sports facilities.	Detailed amendments made to the chapter and policies to address comments and suggestions received. Amendments made to the public rights of way policy in accordance with the technical and specialist advice.
Infrastructure Provision: *Comments were received from 36 individuals and organisations/businesses on the Infrastructure Provision Chapter. These included comments from 10 individuals at the events and 11 responses to the set survey*	

Main Issues	How this was taken into account?
questions. In addition, detailed comments were received from 16 organisations and businesses, including from Thames Water, National Grid, West Sussex County Council, Southern Water, Surrey County Council, Department for Education, Gatwick Airport Limited, The Woodland Trust, Environment Agency, The Ifield Society, Town Access Group, NHS Property Services and one agent on behalf of developer/landowner. *Specific comments were received on page 83, paragraph 8.3, 8.9, 8.15-8.22 and on every policy in this Chapter (IN1, IN2 and IN3) as well as general observations on provision of Infrastructure within Crawley.*	
• Concerns raised around designations impacting on future development potential and landowner concerns. • Health and education issues raised by local residents and the infrastructure providers/agencies. • Support for infrastructure policies, regarding maintenance and where they are located outside of Crawley (but serve Crawley). • Information provided regarding specific infrastructure services and networks (including water, waste water, energy, education, highways, fire and rescue, and health). • Request for financial contributions to be sought from development to support education and health needs. • Detailed wording suggested for the communications infrastructure policy.	Detailed amendments made to the chapter and policies to address comments and suggestions received. Cross-reference now made to the new Planning Obligations Annex to accompany the Plan, which collates all known and anticipated developer contributions associated with the Local Plan policies. Inclusion of reference to securing contributions towards education and health has been included in the policy. Amendments made to the communications policy in accordance with the technical and specialist advice.
Economic Growth: *Comments were received from 33 individuals and organisations/businesses on the Economic Growth Chapter. These included comments from three individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 21 organisations and businesses, including from Mole Valley District Council, Sport England, Manor Royal BID, West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, Reigate and Banstead Borough Council, Horsham District Council, the Ifield Society, and 10 agents on behalf of developer/landowners and one business.* *Specific comments were received on Policies EC1, EC2, EC3, EC4, EC5, EC6, EC7, EC8, EC9, EC10 and EC12 as well as general observations on Economic Growth of Crawley.*	
• Comments in relation to the constrained land supply and developer promotion of sites and safeguarding and car parking from agents on behalf of landowners of sites within this area. • Concern regarding interpretation of the office policy – with a few businesses and agents believing it to be prioritising office development over other business development such as industrial. • Support and concerns raised in relation to the Visitor and Night-Time economy policies – including in relation to hotels in Manor Royal and at the Airport.	This chapter has been amended to reflect the updated evidence from the Economic Growth Assessment. Amendments have been made to reflect the intention to undertake an Area Action Plan on the “area of search” land, which will include consideration of meeting the economic needs arising from the borough. The Skills Policy has been amended and greater detail regarding the planning obligations expectations from developers has been included in the Planning Obligations Annex.
Gatwick Airport: *Comments were received from 39 individuals and organisations/businesses on the Gatwick Airport Chapter. These included comments from nine individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 20 organisations and businesses, including from Mole Valley, Manor Royal BID, West Sussex County Council, Thames Water, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access*	

Main Issues	How this was taken into account?
Group, Horsham District Council and six agents on behalf of developer/landowners and one business. *Specific comments were received on paragraphs 10.1-10.9, 10.11-10.15, 10.17-10.25, 10.27-10.30, and on every policy in this Chapter (Policies GAT1, GAT2, GAT3 and GAT4) as well as general observations on Gatwick Airport.*	
• Support for retaining safeguarding and support for removing safeguarding from the public. Gatwick Airport Limited support retaining safeguarding and landowner submissions requiring the removal of safeguarding for other economic development. • Position from Gatwick Airport Limited supporting amending the Airport boundary and, objections from landowners and others suggesting it to be retain as current (should safeguarding be retained). • Support for all on-airport parking, and support for allowing off-airport parking from the public. Representations from off-airport parking provider supporting off-airport parking. Support for retaining on-airport parking approach from Gatwick Airport Limited.	The draft Local Plan proposes to remove safeguarding and replace a wider area "the Area of Search" with the commitment to produce an Area Action Plan. This Development Plan Document will be commenced at the point of the Local Plan's adoption. It will consider the appropriate land uses within the area and set detailed policies for the proper planning and development of the area. This will include the need for runway expansion and airport growth (subject to robust evidence of need); economic development, housing development and the Crawley Western Link Road alignment. It will also include consideration of the land needed to maintain the gap between Crawley and the Airport. The draft Local Plan maintains the on-airport car parking approach. The draft Local Plan maintains the Airport boundary to that relating to the council's own records.
Crawley Town Centre: *Comments were received from 26 individuals and organisations/businesses on the Crawley Town Centre Chapter. These included comments from eight individuals at the events and 12 responses to the set survey questions. In addition, detailed comments were received from five organisations and businesses, including from Sussex Wildlife Trust, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner.* *Specific comments were received on Policies TC2, TC3 and TC5 as well as general observations on Crawley Town Centre.*	
• Limited responses overall in relation to the Town Centre. • Strong support for Crawley Town Centre facilities and accessibility. • Desire for greater offer and particular shops. • Support the need for neighbourhood facilities policy, but concern the policy should not be used for residential developments to provide the facilities required. • Highlighting the need for town centre impact testing to include other town centres beyond Crawley town centre from RBBC (i.e. Redhill).	Amendments have been made to the Town Centre chapter reflect the updated emerging evidence position. Detailed amendments have been made to the Key Opportunities Sites policy for the purposes of clarity. Confirmation has been included to the need for impact testing for other centres beyond Crawley Town Centre.
Housing: *Comments were received from 80 individuals and organisations/businesses on the Housing Chapter. These included comments from 32 individuals at the events, six residents via email/letter, 11 responses to the set survey questions and a response from the local MP. In addition, detailed comments were received from 30 organisations and businesses, including from Thames Water, Mole Valley District Council, Southern Water, Home Builders Federation, West Sussex County Council, Sussex Ornithological Society,*	

Main Issues	How this was taken into account?
Gatwick Airport Limited, The Woodland Trust, Rusper Parish Council, Sussex Wildlife Trust, CPRE Sussex, National Custom and Self-Build Association, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group, Mid Sussex District Council, Horsham District Council and nine agents on behalf of developer/landowners, one business, one agent on behalf of the Crawley Goods Yard and Natural England (received late due to technical issue). *Specific comments were received on paragraphs 12.17 and 12.34 and Policies H1, H2, H3b, H3c, H3d, H3e, H3g, H4, H5, H6, H7 and H8 as well as general observations on Housing and the Housing Trajectory.*	
• Comments made by other authorities regarding their inabilities in meeting Crawley's unmet needs supporting maximising the amount to which Crawley meets its own needs within its boundaries and pressing the Local Plan to ensure no stone is unturned (including support for the increased densities policy). • Some concerns from neighbouring authorities raised over the remit and wording of the draft urban extensions policy. • Concern against 'over development' of Crawley, and support for urban extensions instead of building within Crawley where this is to meet Crawley's affordable housing needs, from some local residents. • Support for 'going up' instead of 'out'. Concern regarding particular promoted urban extension to the west of Crawley by Homes England, from some local residents. • Opposition to building housing on open spaces. • Concern the housing mix being provided is restricted to small units, not meeting needs of families, and perception of too many flats and not enough houses (even small houses with gardens). • New site at St. Catherine's Hospice promoted for housing or care home. • Support from landowners/developers of existing sites for the continued inclusion of their site in the Plan. Suggestions from some landowners that the anticipated yield should be reconsidered and increased. • Comments received on detailed policies for Build to Rent and Custom and Self-Build Housing. • Concern regarding the continued allocation for the reserve Gypsy and Traveller site at Broadfield Kennels from two local residents and the local MP, as well as an objection to the existing housing allocation at Breezehurst Drive Playing Fields from one local resident.	Amendments have been made to the housing chapter reflect the updated evidence position. This includes changing the affordable housing tenure split to 75/25 rental/intermediate (from the existing 70/30 split). Amendments to the Key Housing Sites policy to reflect the factual build-out of sites and allocate three new sites (one new town centre key opportunity site; one housing and open space site; and one housing for older people site; and the deallocation of one site due to conflicts with the noise policy). Some changes have been made to better clarify the purpose of the urban extensions policy.
Green Infrastructure & Biodiversity: *Comments were received from 22 individuals and organisations/businesses on the Green Infrastructure & Biodiversity Chapter. These included comments from four individuals at events and eight responses to the set survey questions. In addition, detailed comments were received from 10 organisations and businesses, including from West Sussex County Council, the British Horse Society, Sussex Ornithological Society, The Woodland Trust, Sussex Wildlife Trust, Environment Agency, the Ifield Society, one agent on behalf of developer/landowner and Natural England (received late due to technical issue).* *Specific comments were received on paragraph 13.17 and on every policy in this Chapter (Policies GI1, GI2, GI3 and GI4) as well as general observations on Green Infrastructure and Biodiversity.*	
• Concerns raised around designations impacting on	Detailed amendments made to the chapter

Main Issues	How this was taken into account?
future development potential and landowner concerns. • Support for the Green Infrastructure and Biodiversity policies. • Suggested detailed wording for the Green Infrastructure policy and the Biodiversity policies. • Support for Biodiversity Net Gain – recommendations to strengthen the requirement, and concern regarding ensuring this is considered properly as part of the viability assessment. • Some suggested additional sites for consideration against the Local Green Space criteria, including: Tilgate Park, Worth Park, Grattons Park, Milton Mount, The Hawth, West Green Park and Ifield Millpond (currently the designation only applies to Ifield Brook Meadows and Playing Fields). • Concern from the landowner that the Local Green Space designation goes further than national policy.	and policies to address comments and suggestions received.
Sustainable Design & Construction: *Comments were received from 19 individuals and organisations/businesses on the Sustainable Design & Construction Chapter. These included comments from two individuals at events, one resident via email and eight responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from Southern Water, Home Builders Federation, Manor Royal BID, CPRE Sussex, Environment Agency, two agents on behalf of developer/landowners and Natural England (received late due to technical issue).* *Specific comments were received on every policy in this Chapter (Policies SDC1, SDC2 and SDC3) as well as general observations on sustainable design and construction.*	
• Support for the need to encourage sustainable energy provision. • Support for the tightening of water usage requirements. • Objections to requiring higher than national requirements.	Detailed amendments made to the chapter and policies to address comments and technical suggestions received.
Environmental Protection: *Comments were received from 19 individuals and organisations/businesses on the Environmental Protection Chapter. These included comments from one individual at events and eight responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, CPRE Sussex, Environment Agency, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner.* *Specific comments were received on paragraph 15.18 and Policies EP1, EP2, EP3 and EP4 as well as general observations on Environmental Protection.*	
• Support for the flooding policies. • Concerns regarding air quality – particularly in relation to air and road transport, as well as from Pease Pottage compost facility. • Concern regarding noise pollution – particularly in relation to air and road transport, including from landowners affected and from GAL, who particularly drew attention to two of the housing allocations in the Plan (Steers Lane and Heathy Farm, both Forge Wood Residual Sites).	Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current national and local environmental health advice.
Sustainable Transport: *Comments were received from 48 individuals and organisations/businesses on the Sustainable Transport*	

Main Issues	How this was taken into account?
Chapter. These included comments from 20 individuals at events and 10 responses to the set survey questions. In addition, detailed comments were received from 18 organisations and businesses, including from Metrobus, Network Rail, Surrey County Council, Home Builders Federation, Manor Royal BID, West Sussex County Council, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group and five agents on behalf of developer/landowners. *Specific comments were received on paragraphs 16.1, 16.14 and on every policy in this Chapter (Policies ST1, ST2, ST3 and ST4).*	
• Support for sustainable transport – strong support for the bus network and Fastway and improvements strongly supported. • Need to improve the cycle network and pedestrian access in the town. • Concern about existing road and junction capacity. • Support and objections to the principle of a Crawley Western Relief Road (tied to whether there was support or objection to potential urban extensions to the west of Crawley), and some detailed concerns regarding the alignment from landowners affected and Gatwick Airport Limited.	Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current highways advice and local and corporate sustainability approach. Parking Standards have been updated to incorporate the most up-to-date West Sussex evidence and these have been developed into a new Parking Standards Annex for the Local Plan. Reference in the Plan to the "Relief" road has been amended to the "Link" road, as this is felt better reflects the purpose of the road. The plan of "area of search for the Crawley Western Link Road" has been amended to show the correct area to the A23 north of County Oak.

b. Sustainability Appraisal/Strategic Environmental Assessment

2.37 Comments were received from five individual organisations and businesses on the SEA/SA. These were from the Sussex Ornithological Society, Sussex Wildlife Trust, Environment Agency and two agents on behalf of developer/landowners. Representations which had been made by Natural England on 18 September 2019, but not received by the council due to a technical issues, were subsequently received in July 2020. These concurred with the findings of the SA scoping report and SA draft report.

c. Infrastructure Plan

2.38 Comments were received from five individual organisations and businesses on the Infrastructure Plan. These were from West Sussex County Council, Department for Education, the Environment Agency and two agents on behalf of developer/landowners.

d. Habitat Regulations Assessment

2.39 Comments were received from one organisation on the Habitat Regulations Assessment, the Sussex Ornithological Society, who confirmed they believed an Appropriate Assessment was not necessary for Crawley Borough. Representations which had been made by Natural England on 18 September 2019, but not received by the council due to a technical issues, were subsequently received in July 2020. These concurred with the findings of the Habitats Regulations Screening Report.

3. Publication Consultation Stage (Regulation 19)

CONSULT	*Stage two – publication*
	Draw upon evidence and feedback received through early engagement to produce a final draft planning document. Undertake consultation to allow comment on the draft plan and any supporting documents including the Sustainability Appraisal (if required). For Development Plan Documents this will be a minimum six-week period. For Supplementary Planning Documents, this will be a period of between four and six weeks. Publicise consultation and ensure that all documents are readily available to view to make sure that everyone has sufficient opportunity to comment.

3.1 Following the close of the previous consultation (Early Engagement), all responses received were collated. These fed into the preparation of the draft Local Plan for its consideration by the council.

3.2 This Consultation Statement document was updated to summarise the comments received, the council's responses to these matters, and where they have been taken into account and/or led to changes in the draft Local Plan (see Section 2.b above and Appendix 2).

3.3 A formal decision was made at Full Council on 16 December 2019 which agreed the draft Plan for publication and submission to the Secretary of State for its independent examination.

Publication Consultation's Aims

3.4 Publication Consultation is a formal stage of public consultation, undertaken to secure representations on the draft Local Plan which is considered by the council as its 'sound' Local Plan ahead of its submission for independent examination.

How the consultation was conducted

3.5 The initial stage of Publication Consultation took place over a six week period between 20 January and 2 March 2020.

3.6 As part of the consultation, the council published the following documents for scrutiny and comment:

Key Documents

- Crawley 2035: Draft Submission Crawley Local Plan 2020 – 2035 (January 2020)
- Sustainability Appraisal/Strategic Environment Assessment Draft Report (January 2020)
- Habitat Regulations Assessment Draft Report (January 2020)
- Draft Consultation Statement (January 2020)
- Draft Infrastructure Plan (January 2020)

Supporting Technical Evidence Base

- Housing Trajectory (December 2019)
- Strategic Housing Land Availability Assessment (January 2020)
- Strategic Housing Market Assessment (November 2019)

- Northern West Sussex Economic Growth Assessment (January 2020)
- Employment Land Trajectory (December 2019)
- Retail, Commercial Leisure and Town Centre Needs Assessment (January 2020)
- Eco-Serv-GIS Report (January 2020)

3.8 These were available online on the council's dedicated website and paper copies could also be viewed at the Town Hall and Crawley Library.

3.7 A Representation Form was available to download for representations to be received. For this consultation, representors were asked to provide their contact details, and asked to confirm whether they consider the Local Plan to be:

1. Legally Compliant;
2. Sound.

Representors were expected to provide justification to support their position and requested to make suggestions as to how any flaws they consider the Plan to have could be rectified.

Who we consulted

3.8 The formal public consultation was open for the involvement and engagement for all who have an interest in Crawley borough. This included those who live, work and visit the town, as well as investors, businesses, landowners, developers, neighbouring authorities and interest groups (national, south east England, Sussex and local).

3.9 Those self-registered on Crawley Borough Council's Planning News Alert service were notified by email, on three occasions:

→ at the start of the consultation;
→ at the mid-point of consultation; and
→ a final reminder with one week to go before the end of the consultation.

3.10 Those notified through the Planning News emails included statutory consultees, developers, stakeholders, interest groups, and individual residents.

Summary of Representations Received

3.11 In total, 69 individuals and organisations submitted formal representations to the Local Plan consultation. These included comments on the:

- draft Local Plan;
- Local Plan Map;
- Sustainability Appraisal/Strategic Environmental Assessment;
- Habitat Regulations Screening Report;
- Infrastructure Plan

3.12 Representors included:

- local residents;
- neighbouring Local Authorities (Arun, Horsham, Mid Sussex, Mole Valley, Reigate and Banstead, Tandridge, Waverley) and the county councils (Surrey and West Sussex);
- landowners, developers, house builders and Planning Consultants;
- local businesses (including Gatwick Airport Limited);
- government departments and national agencies (including Crawley CCG, Department for Education, Environment Agency, Highways England, Historic England, Homes England, Natural England, NHS Property Services, and Sport England)

- utility companies (including Southern Water and Thames Water); and
- specific interest groups (including Crawley Green Party, Gatwick Area Conservation Campaign, Gatwick's Big Enough, Home Builders' Federation, The Ifield Society, Ifield Village Conservation Area Advisory Committee, Sussex Ornithological Society, and Sussex Wildlife Trust)

3.13 Comments received through this consultation were varied. Key messages received have been summarised below according to Local Plan Chapter. Full representations can be found in Appendix 4 of this report. Council responses have not been prepared against these representations received.

Local Plan General & Vision

General comments on the Local Plan and its vision were received from four representors. These included neighbouring local authorities, national government agencies, developers and specific interest groups: Reigate and Banstead Borough Council, Environment Agency, Quod and Sussex Wildlife Trust.

Comments were received on the strategic approach to housing, economy and the environment.

- Request from Reigate and Banstead Borough Council to amend references to Housing Market Areas and overlaps between them in relation to **paragraph 2.26**.
- The Environment Agency question whether the issue of stress on sewage infrastructure is being included in the Local Plan or not.
- The Sussex Wildlife Trust support the Vision and suggest further additional amendments.

Sustainable Development

Comments on this Chapter were received from 25 representors. These included those from neighbouring local authorities, national government agencies, landowners and planning agents, businesses and specific interest groups: Highways England, St. Catherine's Hospice, Historic England, Environment Agency, Rainier Developments Ltd, Sport England, West Sussex County Council, Sussex Wildlife Trust, LRM Planning Limited, Legal & General, Sport England, Horsham District Council, Ardmore Ltd, UK Commercial Property Finance Holdings Ltd, Wilky Group, Natural England, HX Properties Ltd, Montagu Evans on behalf of Homes England, Tandridge District Council, Quod, Reigate and Banstead Borough Council, Mole Valley District Council, Mid Sussex District Council, Gatwick Airport Ltd and LRM Planning Limited.

Comments were received in relation to Policies SD1, SD2 and SD3.

- The strategic objectives in **Policy SD1: Presumption in Favour of Sustainable Development** were criticised by The Hospice due to repetition elsewhere in the Plan, whilst the heritage objective was supported by Historic England, and the Environment Agency wanted an additional objective about water resources added.
- Highways England flagged the importance of Transport Assessments, both for the Local Plan and individual sites.
- Respondents, including WSCC Public Health team and Sport England support **Policy SD2: Enabling Healthy Lifestyles and Wellbeing,** with some minor wording changes suggested by some.
- GAL, and Legal and General, owners of an extensive landholding in Mole Valley, objected to the removal of safeguarding citing the Aviation 2050 consultation document which states it is "prudent to continue to safeguard". GAL argues **Policy SD3: North Crawley Area Action Plan** is contrary to existing and emerging aviation and national planning policy which requires the continuation of safeguarding, and that the land is not required to meet employment needs which can be satisfied elsewhere in the borough, including within the airport and in neighbouring districts.
- Landowners with sites within the Area Action Plan (AAP) area supported the removal of safeguarding, and the designation of the AAP area through **Policy SD3**. Representors cited the Government support of expansion at Heathrow to argue that there is no national policy need for continued safeguarding at Gatwick.

- Varying amounts of supporting information was provided by different landowners in promotion of their specific sites particularly for employment use, for which unmet need was highlighted, in response to draft **Policy SD3**.
- Some landowners argued that the AAP should include provision for other uses including airport parking, and for temporary uses and small scale development to be acceptable whilst the AAP was under preparation.
- Some landowners objected to the inclusion of previously unsafeguarded land within the AAP boundary.
- Owners of land east of Gatwick supported the AAP but also proposed an alternative approach with partial safeguarding, and the release of their site for employment use.
- Several landowners requested more specific details on timelines for the AAP, or suggested that the AAP should be brought forward in parallel with the preparation of the Local Plan. Other landowners argued that the Plan itself should allocate strategic sites to avoid delay in identifying and meeting economic needs.
- Sussex Wildlife Trust raised concern about the commitment to development in the area without this being considered alongside the Crawley and Horsham emerging Local Plans.
- Mole Valley District Council argued the AAP should be brought forward to determine the amount of housing the area could accommodate, and Mid Sussex District Council argued that the area offered the opportunity to consolidate employment land and release underused employment sites elsewhere for housing.
- Horsham District Council supported the AAP policy but suggested that reference needed to be made to the need to liaise closely with HDC because safeguarding extends into Horsham District.
- Tandridge District Council raised concerns about the impact of development in the AAP area on infrastructure, particularly transport, and sought involvement in future consultations.
- Sport England considered that any land or buildings in sport or recreation use with the AAP area should be retained unless proven to be surplus, or replaced, and Historic England flagged the need for account to be taken of heritage assets.

Character, Landscape & Development Form

Comments on this Chapter were received from 15 representors. These included local residents, neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: St Catherine's Hospice, Sussex Wildlife Trust, Ardmore Ltd, UK Commercial Property Finance Holdings Limited, Historic England, Persimmon Homes Ltd, Homes England, Horsham District Council, Mid Sussex District Council, Home Builders' Federation, Rainier Developments Ltd, West Sussex County Council Property and Assets, SKY Gem Properties Ltd. and Universities Superannuation Scheme.

Comments were received on Policies CL1, CL2, CL3, CL4, CL5, CL6, CL7, and CL8.

- Support for the retention of **Policy CL1: Neighbourhood Principle**, as its origin comes from the original new town spatial strategy and is a distinguishing characteristic of the town.
- Suggested change to **Policy CL1** so it states that higher density will be encouraged where it is situated in sustainable locations (as opposed to stating higher density 'may be compatible').
- Support for the combination under one chapter of character, the design of new development and landscape character.
- Support for **Policies CL2 – CL5** which require the form of new development to reflects the defining characteristics of each neighbourhood.
- Representation that **Policy CL2**: **Making Successful Places: Principles of Good Urban Design** makes no reference to the National Design Guide.
- Suggestion that **Policy CL2** should set out the minimum density ranges.
- Respondents encouraged to see their amendments have been incorporated.
- Concern, despite clarification within the supporting text to **Policy CL3: Local Character and the Form of New Development**, that all new development, such as minor alterations or smaller scale development will be required to support the council in bringing forward area wide character assessments.

- Homes England raised concerns that a number of new requirements including the support of area wide character assessment, framework plans and development briefs, design codes and three-dimensional masterplans, is too onerous and could delay development coming forward.
- In regard to **Policy CL3** and character assessment, Homes England reiterated that preparation of such work is not an effective use of the council's own resources and it should be for the landowner or developer to lead on.
- Support for **Policy CL3**, particularly in its reference to protecting, enhancing and reinforcing 'heritage assets and their settings'.
- In respect of a future extension to Manor Royal, suggestion that character assessment should form part of the Area Action Plan process.
- Agreement that **Policies CL4-CL6** set out a series of design parameters that will help to ensure that high-quality sustainable design is achieved.
- Representation on **Policy CL4: Effective Use of Land: Sustainability, Movement and Layout**, minimum walking distances in relation to enabling higher density, that the 5 – 8 minute time stated is incorrect and should be increased, thus opening up more land for higher density ranges.
- Request clearer cross reference to **Policy CL4** which specifies minimum densities.
- Comment regarding **Policy CL5: Form of New Development – Layout, Scale and Appearance** and density ranges; that it would be more effective if it was exactly identified where proposed density ranges would apply.
- Representation that a densification study is prepared which will consider, amongst other things, appropriate densities and potential locations.
- Representation in regard to **Policy CL5** and the use of master planning and development briefs; that a more appropriate threshold is made before they are applicable.
- Suggestion from the landowner to remove the designation of **Policy CL6: Structural Landscaping** to some areas.
- Comments were received in relation to Policy CL8: Development Outside the Built-Up Area Boundary, requesting the protection of West of Ifield Rural Fringe with acknowledgement of nature importance and protect Local Wildlife Sites from development e.g. Worth Way, as well as comments requesting positive amendments to the Policy to encourage some development outside Built-Up Area Boundary.

Design & Development Requirements

Comments on this Chapter were received from 11 representors. These included local residents, neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: Horsham District Council, Surrey County Council, Historic England, Sussex Wildlife Trust, Home Builders' Federation, Gladman Developments Ltd, Habinteg, Rainier Developments Ltd, Thames Water Utilities Ltd. and Gatwick Airport Ltd.

Comments were received on Policies DD1, DD2, DD3, DD4, DD5, DD6 and DD7.

- Representations were received to suggest that both the compensation for replacement trees does not go far enough in **Policy DD5: Tree Replacement Standards**, and that the financial compensation for replacement trees is considered unviable.
- GAL support for inclusion of a standalone policy for aerodrome safeguarding (**Policy DD6**), and suggested several helpful text amendments that have been factored into the policy.

Heritage

Comments on this Chapter were received from three representors. These included a national government agency, a planning agent representing a landowner and a specific interest group: Historic England, St Catherine's Hospice and Ifield Village Conservation Area Advisory Committee.

Comments were received on Policies HA1, HA2, HA4, HA6 (support) and HA7.

- Suggested changes to **Policy HA1: Heritage Assets** to refer to protections for designated heritage assets in the NPPF.

- Support for policies relating to designated Heritage Assets (i.e. **Policies HA2; Conservation Areas**, **HA4: Listed Buildings**, **HA7: Heritage Assets of Archaeological Interest**).
- Representation on **Policy HA2: Conservation Areas** recommending greater support for well designed, innovative, high-density development where it improves the setting.
- Ifield Village Green should be included as a Park & Garden under **Policy HA6: Historic Parks and Gardens**.

Open Space, Sport & Recreation

Comments on this Chapter were received from five representors. These included neighbouring local authorities, national government agencies and specific interest groups: Horsham District Council, Ifield Village Conservation Area Advisory Committee, Mid Sussex District Council, Sport England and Sussex Wildlife Trust.

Comments were received on Policies OS1 and OS2.

- Comments received on **Policy OS1: Open Space, Sport and Recreation** suggest that surplus open space should support meeting housing needs whilst improving recreational opportunities (to reflect **Policy H3f: Housing Typologies – Open Spaces**).
- **Policy OS1** should cross-reference to **Policy SD3: North Crawley Area Action Plan**, to maximise opportunities to utilise land within the Gatwick Safeguarded area for open space in order to releasing land for housing.
- Support for amendments made to **Policy OS2: Provision of Open Space and Recreational Facilities**.

Infrastructure Provision

Comments on this Chapter were received from 12 representors. These included three local residents, national government departments and agencies, the county council, utilities providers, landowners and planning agents, and businesses: Thames Water Utilities Ltd, Department of Education, St Catherine's Hospice, LRM Planning Ltd, Crawley CCG, Environment Agency, Gatwick Airport Ltd, West Sussex County Council and Highways England.

Comments were received on Policies IN1, IN2 and IN3.

- General concerns about infrastructure impacts of new development and importance of recognising various assets (e.g. the hospital) as part of infrastructure provision.
- Thames Water concerns around timing of new development in relation to upgrades to WWTW that may be required.
- Comments on **Policy IN1: Infrastructure Provision** regarding Education: supportive of S106 for education (though this has now been removed); seeking more scope for use of S106 including back-funding of schemes already delivered, and removal of requirement that specific schemes be identified. Highlights importance of planning for school growth and role of statement of common ground.
- **Policy IN1** should require provision of any additional infrastructure required to support airport expansion.
- Concerns as to whether **Policy IN1** is sufficiently flexible to allow reprovision outside the borough where appropriate for the kind of facility in question
- Comments on **Policy IN1** seeking greater priority for medical facilities in terms of CIL spend
- Recommendation for water quality monitoring requirements via S106 and greater attention to water quality.
- Representation seeking clearer support for expansion of waste water facilities where required.
- **Policy IN2: The Location and Provision of New Infrastructure** provisions allowing for education facilities on a site allocated for uses including housing are not considered sufficiently flexible.
- Support for **Policy IN3: Supporting High Quality Communications**: WSCC support for policy approach to ensuring that development is future-proofed to be gigabit capable, full-fibre ready; and resident support for the inclusion of a digital communication infrastructure

policy.

Economic Growth

Comments on this Chapter were received from 18 representors. These included local residents, national government departments and agencies, neighbouring local authorities, landowners and planning agents, businesses and specific interest groups: Horsham District Council, Surrey County Council, Ardmore Ltd, UK Commercial Property Finance Holdings Ltd, Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group, Homes England, Quod, Gatwick Airport Ltd, Mole Valley District Council, Mid Sussex District Council, Wilky Group, Reigate and Banstead Borough Council, Universities Superannuation Scheme, Bellway Homes Ltd, HX Properties, Caravan and Motorhome Club and Sussex Wildlife Trust.

Comments were received on Policies EC1, EC2, EC3, EC4, EC6, EC10 and EC12.

- Support **Policy EC1: Sustainable Economic Growth** approach of maximising use and intensification of existing main employment areas for economic development, protecting Manor Royal for business-led uses, and identifying small extensions to Manor Royal that would support the delivery of business land and floorspace.
- A range of views on the principle of a North Crawley Area Action Plan to consider the scope for a Strategic Employment Location. Some site promoters were supportive of the approach, whilst others felt that the Local Plan should be more pro-active and allocate site(s) without the need for an AAP. These parties suggested that Crawley should be planning for the higher Baseline Labour Supply figure of 113ha employment land.
- Gatwick Airport objected to the principle of a Strategic Employment Location on the safeguarded land, considering that the council should instead plan for the lower 'continuation of past trends' figure of 33ha business land through the intensification of existing main employment areas and use of Article 4 Directions.
- A site promoter submitted detail of an employment site that it wishes to see allocated by MVDC to accommodate Crawley's unmet employment needs. Mole Valley DC advised that it is unable to help accommodate Crawley's unmet business land needs due to physical constraints and it having little relationship to the Northern West Sussex Functional Economic Market Area.
- RBBC outlined that given the focus of the allocated Horley Strategic Business Park, there is no unmet need for offices from Crawley. RBBC confirmed it is not in a position to accommodate any of Crawley's unmet industrial or warehouse needs and advised that meeting this need should be the focus of any SEL allocated through an AAP.
- Support for the **Policy EC2: Economic Growth in Main Employment Areas** approach of protecting and making efficient use of main employment areas for economic growth.
- One representation suggested there should be greater flexibility to allow residential uses in main employment areas.
- Gatwick Airport objected to the development of existing main employment areas that are currently within the safeguarded land. It advised that there is land available at the airport to help meet Crawley's employment needs.
- Support for the **Policy EC3: Manor Royal** approach of protecting Manor Royal, and maximising the efficient use of land, for business-led employment.
- Support for **Policy EC4: Employment and Skills Development**, but it was questioned how this would be applied for applications, specifically for speculative developments.
- In relation to **Policy EC6: Visitor Accommodation**, Holiday Extras is of the view that a 'needs' test should be applied for hotel and visitor accommodation located on-airport, for consistency with the Policy GAT2 requirement that additional on-airport parking is justified by a demonstrable need. Caravan Club objection to sequential test being applied to visitor accommodation.
- GAL objected to the application of a sequential test to hotel and visitor accommodation within the airport boundary, noting that this is a sustainable location for hotels given the nature of the users (i.e. in relation to flights). Advised that hotel provision within the airport boundary should be exempt from the sequential text.
- **Policy EC10: Employment Development and Residential Amenity** was supported by the Goods Yard operators.
- Request to add reference in **Policy EC12: Rural Economy** to protecting connectivity of

the green infrastructure network.

Gatwick Airport

Comments on this Chapter were received from 14 representors. These included local residents, neighbouring local authorities, utilities providers, landowners and planning agents, businesses and specific interest groups: Thames Water Utilities Limited, Gatwick's Big Enough, CAGNE, Gatwick Area Conservation Campaign, UK Commercial Property Finance Holdings Ltd, Reigate & Banstead Borough Council, Environment Agency, Sussex Wildlife Trust, Gatwick Airport Ltd, LRM Planning Limited, HX Properties Ltd, Quod and Wilky Group.

Comments were received on Policies GAT1, GAT2 and GAT3.

- A number of representations to **Policy GAT1: Development of the Airport with a Single Runway** objected to the possible growth of Gatwick Airport via the DCO process, which is beyond the remit of the Local Plan.
- Some respondents felt GAT1 did not do enough to control growth at the airport, and a cap on passenger numbers was suggested.
- Support for the lifting of safeguarding from various employment site promoters, and Thames Water in relation to the need to expand Crawley WwTW.
- GAL suggested a number of policy amendments, including the removal of wording relating to the DCO process, and the addition of wording to keep safeguarding in place.
- Various existing and new off-airport parking operators objecting to Policy GAT2: Gatwick Airport Related Parking and an objection from Wilky and Holiday Extras. Support for from GAL and RBBC for the policy approach.
- General support for **Policy GAT3: Employment Uses at Gatwick**, the approach of allowing non-airport related employment uses where this would not prejudice ability of airport to meet its operational needs as it grows. Support from GAL for this approach.

Crawley Town Centre

Comments on this Chapter were received from four representors. These included neighbouring local authorities, developers and specific interest groups: Sussex Wildlife Trust, Rainier Developments Ltd, Horsham District Council and Reigate and Banstead Borough Council.

Comments were received on Policies TC2, TC3 and TC5.

- Sussex Wildlife Trust want reference in **Policy TC2: Town Centre Neighbourhood Facilities** to accessible open space.
- Developer and HDC support for **Policy TC3: Development Sites within the Town Centre Boundary**. HDC keen to see a density study to ensure opportunities for residential in the TC are maximised.
- Minor amendments suggestions to **Policy TC5: Town Centre First** from RBBC.

Housing Delivery

Comments on this Chapter were received from 30 representors. These included six local residents, neighbouring local authorities, national government departments and agencies, utilities providers, landowners and planning agents, businesses and specific interest groups: Danescroft (RLP Crawley) LLP, Home Builders' Federation, Highways England, Gladman Developments LTD, Sussex Ornithological Society, St Catherine's Hospice, Horsham District Council, Waverley Borough Council, Wood PLC on behalf of Homes England, Homes England, Persimmon Homes Plc, Mole Valley District Council, Sussex Wildlife Trust, Thames Water Utilities Limited, West Sussex County Council Property and Asset Management, The Bucknall Family, Rainier Developments Ltd, Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group, Surrey County Council, Bellway Homes Ltd, Environment Agency, Mid Sussex District Council, Gatwick Airport Ltd and CAGNE.

Comments were received on Policies H1, H2, H3b, H3c, H3d, H3e, H3f and H3g.

- Objections to proposed Local Plan housing requirement on grounds of various environmental impacts, including biodiversity.

- Query whether sufficient infrastructure is in place to support the housing growth & whether it will be possible to phase infrastructure in line with housing growth
- Standard Method figure needs updating on basis of 2020 figures.
- Proposed housing requirement is not enough to meet affordable housing need in the borough.
- Concern raised that there is no agreement with neighbouring authorities about how Crawley's unmet need will be met through SoCG.
- Coordination with neighbouring authorities is also needed to identify impacts on strategic road network if Crawley delivers its proposed housing requirement and Crawley's unmet needs are met 'at Crawley' – also combined with potential airport expansion and new employment sites in vicinity.
- Absence of key evidence (Transport Assessment, Water Cycle Study, Heritage) means there is questionable basis for assuming that a 'supply based' housing requirement will end up at this level – query as to basis of conclusions in SA that higher housing requirement would have significant negative impacts.
- Objections/suggestions made about the approach to individual sites as potential housing sites: e.g. objecting to/ querying sites' exclusion from housing land supply, constraints placed on them, or the indicative dwelling quantum provided (Steers Lane, Tinsley Lane, St Catherine's Hospice, Land East of Street Hill, additional parcels at Forge Wood).
- Objections/suggestions seeking to object to/query proposed housing sites or increase constraints on them or reduce dwelling quantum (Land East of Street Hill, Former TSB Site Russell Way, West of Ifield).
- Objections to specific housing sites proposed owing to environmental impacts
- Query as to whether the identified 5-year land supply meets the deliverability definition in the NPPF.
- Crawley should meet its housing need by building at higher densities and so avoid the need for development in surrounding rural districts which will do greater damage to biodiversity.
- Approach needs more justification in terms of evidence that different types of opportunities have been explored: increased densities, estate regeneration, higher windfall allowance, surplus open space and industrial land.
- Housing requirement doesn't allow for possibility that safeguarding will be lifted, allowing for more development opportunities (areas of search in Forge Wood/Langley Green).
- Concern that tests for identifying additional opportunities to provide housing growth within Crawley are not more clearly defined.
- Various comments supporting/proposing modifications to Policy H3g: Urban Extensions (which has now been largely retained as commentary rather than as a policy).
- Objection to Policy H3g as not being justified or effective.

Meeting Housing Needs

Comments on this Chapter were received from nine representors. These included neighbouring local authorities, landowners, developers and planning agents, businesses and specific interest groups: Gladmans Development Ltd, Catherine's Hospice, Rainier Developments Ltd, Bellway Homes Ltd, Persimmon Homes Ltd, Home Builders' Federation, Tetlow King Planning, Rentplus UK Ltd, Gatwick Airport Ltd and Reigate and Banstead Borough Council.

Comments were received on Policies H4, H5, H7 and H8.

- Policy H4: Housing Mix should be made more flexible, particularly regarding private units.
- Objection to Policy H5: Affordable housing as not meeting NPPF threshold requirement and not supported by viability evidence.
- Requiring self-build on larger sites in Policy H7 is not justified– the council should allocate its own land to these – and the evidence of need (Self-build Register) is not considered sufficiently robust.
- Specific level of self-build requirement is queried.
- Objection to suggestion of Gypsy and Traveller accommodation on safeguarded land in Policy H8.

Green Infrastructure & Biodiversity

Comments on this Chapter were received from 11 representors. These included local residents, landowners, developers and planning agents and specific interest groups: Sussex Ornithological Society, Environment Agency, Sussex Wildlife Trust, Home Builders' Federation, The Ifield Society, Gladman Developments Ltd, Homes England, West Sussex County Council Property and Assets, Crawley Green Party and Natural England.

Comments were received on Policies GI1, GI2, GI3 and GI4.

- Objection received in relation to **Policy GI1: Green Infrastructure** to urban extensions being built as would remove biodiversity benefits on land. Highlighting danger to High Weald AONB and calling for higher densities and improving green infrastructure linkages.
- Support from the Environment Agency and Sussex Wildlife Trust to **Policy GI1**.
- Comments requesting the term soft landscaping be explained (previously in **Policy DD4: Tree and Landscape Character Planting**, now in **Policy GI2: Biodiversity and Net Gain**).
- Objection to the requirement of 10% net gain in **Policy GI2**, as not yet legal, instead suggesting alternative wording to refer to "ensure net gain" rather than having percentage.
- Support for **Policy GI2** from the Environment Agency and Sussex Wildlife Trust, with some additional suggestions made by the Wildlife Trust to the Policy.
- Representations to **Policy GI2**, suggesting protection for the land to the west of Crawley, including extension to Willoughby Local Nature Reserve to protect West of Ifield Rural Fringe and placing a Green Belt around Crawley's administrative boundary.
- Specific landowner requests for the removal of certain areas of Biodiversity Opportunity Areas under **Policy GI3: Biodiversity Sites**.
- Concerns in relation to **Policy GI3** of the threat to ancient woodland, local wildlife and biodiversity in Ifield and near AONB from new development, and suggesting the creation of new Local Nature Reserve in Ifield and higher density housing throughout Crawley is required.
- Support for **Policy GI3** from the Environment Agency and Sussex Wildlife Trust welcome amendments made from the Regulation 18 version and the recognition of aligning to NPPF and promoting connectivity of green infrastructure.
- Representation from the landowner that **Policy GI4: Local Green Space** should mention non inappropriate development that can pass "the test".
- Support from Sussex Wildlife Trust for **Policy GI4** and recommend encouraging local communities to be consulted on Local Green Space to identify and protect current and future spaces.

Sustainable Design & Construction

Comments on this Chapter were received from five representors. These included national government departments and agencies, utilities providers, landowners, developers and planning agents: Rainier Developments Ltd, Surrey County Council, Ardmore Ltd, Environment Agency, Southern Water and Natural England.

Comments were received on Policies SDC1, SDC2 and SDC3.

- Policy SDC1 should be more flexible and avoid adding additional burdens to development.
- Support for stricter water efficiency requirements in Policy SDC3.

Environmental Protection

Comments on this Chapter were received from six representors. These included local residents, national government departments and agencies, utilities providers, landowners, developers and planning agents and businesses: Thames Water Utilities Ltd, Environment Agency, Homes England, Persimmon Homes Ltd and Gatwick Airport Ltd.

Comments were received on Policies EP1, EP2, EP3 and EP4.

- Resident representation noting local flood issues.

- Support for flood risk approach, **Policy EP1: Development and Flood Risk**, from Thames Water (with addition of reference to sewer flooding) and EA.
- EA also support **Policy EP2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions** and **Policy EP3: Land Quality**.
- GAL supportive of **Policy EP4: Development and Noise** and no objection from Persimmon.

Sustainable Transport

Comments on this Chapter were received from 25 representors. These included six local residents, neighbouring local authorities, national government departments and agencies, the county council, landowners, developers and planning agents, businesses and specific interest groups: Wilky Group, West Sussex County Council, Gatwick Airport Ltd, Home Builders' Federation, St Catherine's Hospice, Rainier Developments Ltd, Bellway Homes Ltd, Persimmon Homes Ltd, Homes England, Highways England, The Ifield Society, Sussex Ornithological Society, Horsham District Council, Ardmore Ltd, Ifield Village Conservation Area Advisory Committee, Quod, Historic England, Environment Agency and Sussex Wildlife Trust.

Comments were received on Policies ST1, ST2, ST3 and ST4.

- Requirements of **Policy ST1** for new development sites (in terms of use of sustainable transport) should be more specific.
- Greater potential for development supported by sustainable transport within currently safeguarded land.
- Objection on basis of absent Transport Assessment to support the Local Plan.
- Requirements for electric vehicle charging points should not be included as it is getting ahead of national policy and is not justified by technical feasibility and demand evidence.
- Objections/concerns around **Policy ST4: Safeguarding of a Search Corridor** for a Western Link Road owing to environmental impact on local sites including biodiversity and heritage areas.
- Other views for and against western link road.

Planning Obligations Annex

Comments relating to viability, planning obligations and the Planning Obligations Annex were received from four representors: Sport England, Home Builders' Federation, Department of Education and Gladman Development Ltd.

- Specific comments/advice on approach to particular inputs for assessment of viability.
- Concern raised that Paragraph 2 in **Policy OS2: Provision of Open Space and Recreational Facilities** needs to be in accordance with paragraph 97 of NPPF.
- Highlighted the need to test cumulative impact of new policies, e.g. the effect of 10% net gain on development.

Noise Annex

Comments relating to the Noise Annex were received from two representors: Gatwick Airport Ltd and Homes England.

- Homes England questioned the noise contours used in the Noise Annex.
- GAL raised technical points on the Noise Annex.

Housing Trajectory & Strategic Housing Land Availability Assessment (SHLAA)

Comments relating to the Housing Trajectory were received from one representor: Reigate and Banstead Borough Council.

Comments on the Strategic Housing Land Availability Assessment were received from two representors: local residents and NHS Property Services (NHSPS).

- Queries regarding the treatment of specific sites in relation to windfall allowance within Housing Trajectory.

- Representations on future development potential of Crawley Hospital.

Employment Land Trajectory

Comments relating to the Employment Land Trajectory were received from one representor: Wilky Group.

- Wilky Group discussed its site and others in relation to the **Employment Land Trajectory**.

Duty to Cooperate

Comments relating to the Duty to Cooperate were received from seven representors: Arun District Council, Gladman Developments Ltd, local residents, Reigate and Banstead Borough Council, Mole Valley District Council, Home Builders' Federation and Danescroft (RLP Crawley) LLP.

Sustainability Appraisal/Strategic Environmental Assessment

Comments on the Sustainability Appraisal/Strategic Environmental Assessment were received from ten representors: Reigate & Banstead Borough Council, Gladman Developments Ltd, Sussex Ornithological Society, HX Properties Ltd, Homes England, Historic England, Environment Agency, Sussex Wildlife Trust, Wilky Group and Natural England.

- Need for clearer measures to enhance biodiversity.
- Disagreement with/ objection to particular assessments/weightings, including on policies GAT2, EC3, EC4, EC6 and H1.
- Questioning of why there is no test of higher threshold for affordable housing (Policy H5).
- SEA representations re Gatwick Green.
- Holiday Extras raise various points in relation to the consistency between the 2015 SA/SEA and the current SA/SEA. In particular that off-airport parking for objectives 1 and 2 is assessed as a 'double negative' when it was previously a single negative. The same argument is made in relation to the impact of off-airport parking on biodiversity.
- Question on why higher densities are not encouraged instead of building urban extensions that effect biodiversity.
- Highlight the need to ensure there is a sufficient evidence base upon which to plan to deliver net gain in biodiversity.
- Natural England agree with the findings of the SA and SEA.
- Wilky support conclusions of SA/SEA with regard to the AAP policy but consider that the negative impact cited for "Conserve /enhance Biodiversity and Landscape" should instead be neutral or positive because of the requirement for bio-diversity net gain and mitigation/compensation.

Local Plan Map

Comments on the Local Plan Map were received from one representor: Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group.

- Support for the 250m buffer surrounding the safeguarded railhead site shown on the Local Plan Map.

Infrastructure Plan

Comments on the Infrastructure Plan were received from two representors: West Sussex County Council and Homes England.

- Factual points.
- Request for clearer reference to 'intent to support upgrades of the busway in accordance with expected growth' under 'Studies and Plans' for Bus travel.

Habitats Regulations Assessment

Comments on the Habitats Regulations Assessment Screening Report were received from four representors: Sussex Ornithological Society, Reigate & Banstead Borough Council, Mid Sussex District Council and Natural England.

- Natural England agree with the findings of the HRA Screening Report.
- Reigate and Banstead Borough Council and Mid Sussex District Council provided some additional information regarding HRA in combination and work undertaken for their own Development Plan Documents.
- Sussex Ornithological Society note the intention to carry out “in combination” assessments of impacts on European designated sites outside the Borough Boundaries, to reflect increased levels of development and resulting increased levels of traffic.

4. Additional Publication Stage (Regulation 19)

4.1 A number of key changes were made to the draft Local Plan following the initial period of formal Publication public consultation carried out between January and March 2020. These were reconsidered at Full Council on 16 December 2020 and a formal decision was made which agreed the amended draft Plan for publication and submission to the Secretary of State for its independent examination.

Publication Consultation's Aims

4.2 This period of consultation was undertaken as with the previous Publication Consultation (set out in Section 3 above) in accordance with the requirements of Regulation 19 (see Section 1 above).

How the consultation was conducted

4.3 This second, additional, stage of Publication Consultation took place over an extended six month period between 6 January and 30 June 2021.

Extension of Consultation Duration and Communications

4.4 A Notice of Consultation was published in the local papers at the start of the consultation along with a Press Release.

4.5 The consultation was originally intended as a six week consultation. However, due to delays in securing the final versions of key pieces of evidence for publication, the consultation continued to ensure a minimum of six weeks beyond the end of the publication of the last of these (the Transport Modelling Study Report).

4.6 Communicating the extensions of the consultation involved frequent, timely, notifications. This ensured all parties were provided with adequate information to allow for representations to be made at the appropriate time with the least inconvenience possible. Those self-registered on Crawley Borough Council's Planning News Alert service were notified by email, throughout the consultation, on a number of critical occasions:

- → at the start of the consultation (6 January 2021);
- → for the publication of the draft Habitats Regulations Assessment, updated Economic evidence and updates to the Local Plan and Sustainability Appraisal/Strategic Environmental Assessment (19 January 2021)
- → Notification of Extension of Consultation to 31 March 2021 due to outstanding evidence (3 February 2021);
- → Notification of Extension of Consultation to 30 April 2021 and publication of Viability Assessment (19 March 2021);
- → Notification of Extension of Consultation to 28 May 2021 and publication of Duty to Cooperate Statement (15 April 2021);
- → Notification of Extension of Consultation beyond 28 May 2021 (14 May 2021);
- → Notification of Extension of Consultation to 30 June 2021 and publication of Transport Modelling (18 May 2021); and
- → a final reminder of the close of consultation a one week before the end of the consultation (23 June 2021).

4.7 The council's dedicated Local Plan Review and Local Development Scheme webpages were both similarly continually updated accordingly.

Coronavirus Pandemic

4.8 The consultation took place during the unusual period affected by the Covid global pandemic and whilst the country was subject to "lockdown" restrictions. It was guided by the Town and Country Planning (Local Planning) (England) (Coronavirus) (Amendment) Regulations 2020.

Consultation Materials

4.9 As part of the consultation, the council published the following documents for scrutiny and comment:

Key Documents

- Crawley Local Plan: Draft Submission Crawley Local Plan 2021 – 2037 (January 2021)
- Local Plan Map (January 2021 – updated in May 2021)
- Sustainability Appraisal/Strategic Environment Assessment Draft Report (January 2021)
- Draft Habitat Regulations Assessment of Crawley Borough Local Plan (January 2021)
- Draft Consultation Statement (January 2021)
- Draft Infrastructure Plan (January 2021)
- Northern West Sussex Statement of Common Ground (May 2020)
- Gatwick Diamond Local Strategic Statement 2016
- Crawley Borough Council and Mole Valley District Council Statement of Common Ground (January 2021)
- Crawley Borough Council and Reigate and Banstead Borough Council Statement of Common Ground (January 2021)
- Draft Duty to Cooperate Statement (March 2021)
- Worthing Borough Council and Crawley Borough Council Statement of Common Ground (May 2021)

Supporting Technical Evidence Base

- Topic Paper 1: Unmet Needs and Duty to Cooperate (January 2021)
- Topic Paper 2: Gatwick Airport (January 2021)
- Topic Paper 3: Housing Needs (January 2021)
- Topic Paper 4: Housing Supply (January 2021)
- Topic Paper 5: Employment Needs and Land Supply (January 2021)
- Topic Paper 6: Climate Change (January 2021)
- Topic Paper 7: Development and Noise Technical Appendix (January 2021)
- Housing Trajectory (1 September 2020)
- Strategic Housing Land Availability Assessment (January 2021)
- Strategic Housing Market Assessment (November 2019)
- Crawley Windfall Statement (January 2021)
- Northern West Sussex Economic Growth Assessment (January 2020)
- Economic Growth Assessment – focused update for Crawley (September 2020)
- Employment Land Availability Assessment (January 2021)
- Employment Land Trajectory (January 2021)
- Retail, Commercial Leisure and Town Centre Needs Assessment (January 2020)
- Eco-Serv-GIS Report (January 2020)
- Strategic Flood Risk Assessment (September 2020)
- Site Allocations and Flood Risk Background Paper (October 2020)
- Open Space, Sport and Recreation Assessment (December 2020)
- Indoor Sports Facilities Assessment (January 2021)

- Playing Pitch Assessment (January 2021)
- Playing Pitch Strategy Stage C Needs Assessment (March 2021)
- Playing Pitch Strategy Stage D Strategy and Action Plan (March 2021)
- Draft Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (January 2021)
- Draft Densification Study Part 1 (January 2021)
- Safely Landed? Lichfields Report (July 2018)
- Gatwick Sub-Region Water Cycle Study (August 2020)
- Crawley Heritage Assets Review (January 2021)
- Water Cycle Study Crawley Addendum (January 2021)
- Crawley Borough Council – Climate Emergency Support (June 2020)
- Air Quality and Emissions Mitigation Guidance for Sussex (January 2020)
- Land-Use Planning and Development Control: Planning for Air Quality (January 2017)
- Planning Noise Advice Document Sussex (2021)
- Local Plan and Community Infrastructure Levy Viability Assessment (March 2021)
- Crawley Transport Study (May 2021)

4.10 These were available online on the council's dedicated website. However, due to restrictions required by the Covid pandemic, it was not possible to make paper copies available.

4.11 A Representation Form was available to download for representations to be received. For this consultation, representors were asked to provide their contact details, and asked to confirm whether they consider the Local Plan to be:

1. Legally Compliant;
2. Sound.

Representors were expected to provide justification to support their position and requested to make suggestions as to how any flaws they consider the Plan to have could be rectified.

Who we consulted

4.12 The formal public consultation was open for the involvement and engagement for all who have an interest in Crawley borough. This included those who live, work and visit the town, as well as investors, businesses, landowners, developers, neighbouring authorities and interest groups (national, south east England, Sussex and local).

4.13 Those notified through the Planning News emails included statutory consultees, developers, stakeholders, interest groups, and individual residents.

Summary of Representations Received

4.14 In total, 39 individuals and 45 business and organisations submitted formal representations to the Local Plan consultation. These included comments on the:

- draft Local Plan;
- Local Plan Map;
- Sustainability Appraisal/Strategic Environmental Assessment;
- Habitat Regulations Screening Report;
- Infrastructure Plan

4.15 Representors included:

- local residents;
- neighbouring Local Authorities (Horsham, Mid Sussex, Reigate and Banstead, Waverley District and Borough Councils, West Sussex County Council, Horley Town Council and Rusper Parish Council);
- landowners, developers, house builders and Planning Consultants (Tony Fullwood Associates, WT Lamb Properties, Staminier Group and Elliot Metals/The Simmonds Family, Ardmore Land Consortium, The Wilky Group, CMA Planning Ltd, Brunel Planning, TS Leisure Property, SGN, DMH Stallard, Danescroft (RPL Crawley) LLP, A2Dominion Group, Squires Planning, Inspired Villages, The Sogno Family Trust, Gladman Development Ltd., Vectos, Oxford Match Limited, Aberdeen Standard Investments, The Planning Bureau Ltd.);
- local businesses (including Gatwick Airport Limited, St. Catherine's Hospice, Holiday Extras, Fernhill Riding School, Radford Road Community Ltd., The Arora Group and Aldi Stores Ltd.);
- government departments and national agencies (including Highways England, Homes England and Natural England); and
- specific interest groups (including Gatwick Area Conservation Campaign, CAGNE, Home Builders' Federation, Ifield Village Conservation Area Advisory Committee, Sussex Ornithological Society, The Woodland Trust and Sussex Wildlife Trust).

4.16 Comments received through this consultation were varied. Key messages received have been summarised below according to Local Plan Chapter. Full representations can be found in Appendix 6 of this report. Council responses have not been prepared against these representations received.

Local Plan General & Vision

General comments on the Local Plan and its vision were received from 13 representors. These included local residents, local authorities, national government agencies, developers and specific interest groups: Crawley Town Centre Bid Board, Highways England, Turley on behalf of A2 Dominion, Squires Planning, Barton Wilmore on behalf of The Sogno Family, West Sussex County Council, Gladman Developments, Rusper Council, SMB Town Planning Limited, and LRM Planning on behalf of WT Lamb Properties, Staminier Group and Elliot Metals/The Simmonds Family.

Comments were received on the strategic approach to housing, economy and the environment.

- WSCC commented that the transport evidence base required (at the time) further work and offered its assistance to address the soundness of the Plan.
- General comments on housing, town centre, and supporting infrastructure.
- General concerns were raised that some evidence base, including viability and transport work, had not been completed at the time of Regulation 19 consultation.
- Concern expressed relating to the proposed allocation of a strategic employment location at Gatwick Green.
- Support for the **Local Plan Vision**, particularly in relation to economic growth.
- Some representation questioned the legal compliance of the Local Plan.

Sustainable Development

Comments on this Chapter were received from 6 representors. These included those from neighbouring local authorities, national government agencies, landowners and planning agents and specific interest groups: Woodland Trust, Natural England, Pegasus Group, Sussex Wildlife Trust, Ardmore/ Windsor Land Consortium, Mid Sussex District Council.

Comments were received in relation to Policies SD1 and SD2, as well as the removed SD3.

- Concern was raised by planning agents on behalf of landowners in relation to the list of criteria set out in **Policy SD1: Sustainable Development**.
- Support was received for criteria, carbon neutral, climate change adaptation and green infrastructure and ancient woodland, set out in **Policy SD1**.
- Recommendations were made to strengthen reference to other aspects of sustainable development, natural resource use and minimising pollution, in **Policy SD1**.
- Representations were received from property developers linking health in **Policy SD2: Health and Wellbeing** with housing development.
- Support was received for the inclusion of reference to open space in relation to **Policy SD2**.
- Disappointment was expressed in relation to the deletion of **Policy SD3: North Crawley Area Action Plan**. Some inconsistency remaining throughout the Plan was highlighted.

Character, Landscape & Development Form

Comments on this Chapter were received from 12 representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: Ardmore/Windsor Land Consortium, Mid Sussex District Council, St. Catherine's Hospice, Crawley Town Centre Bid Board, Danescroft (RLP Crawley) LLP, Horsham District Council, WSCC Property and Assets, Sussex Wildlife Trust, The Wilky Group, Aberdeen Standard Investments, Ifield Village Conservation Area Advisory Committee, and Natural England.

Comments were received on Policies CL1, CL2, CL3, CL4, CL5, CL6, CL7, CL8 and CL9.

- Representations were received supporting the neighbourhood principle in **Policy CL1: Neighbourhood Principle**.
- Suggestions were received to secure higher density close to transport corridors.
- Representations were received from land promoters highlighting how their scheme addresses the criteria set out in **Policy CL2: Principles of Good Urban Design**.
- Support was received for the higher densities set out in **Policy CL4: Compact Development** and the maximisation of housing delivery within the borough.
- Support was received for the higher densities close to sustainable transport hubs in **Policy CL4**, but concern was raised that the walking distance was too short and flexibility of application was requested.
- Representations were received suggesting **Policy CL4** should only allow developments below the minimum density of 45dpa in exceptional circumstances and be supported by evidence.
- Objections were received from a planning agent on behalf of a developer to **Policy CL4**.
- Greater evidence in the form of the Densification Study was requested to confirm CBC has done all it can to meet as much of its housing need within the borough as possible.
- Suggestion from the landowner to remove the designation of **Policy CL6: Structural Landscaping** to some areas – this was a repeated representation from the previous Regulation 19 consultation carried out in 2020.
- Representation was received requesting Structural Landscaping be included on the Local Plan Map.
- Representations were received from the planning agents on behalf of land promoters in relation to their proposed schemes and **Policy CL7: Important and Valued Views**.
- Representations were received suggesting amendments to the Built Up Area Boundary and promoting land outside the Built Up Area Boundary, as an extension to Manor Royal for employment use from planning agents on behalf of land promoters (**Policy CL8: Development Outside the Built-Up Area Boundary**).
- Support was received for the West of Ifield Rural Fringe sensitive countryside character area in Policy CL8.
- Concern was raised in relation to the conflict between the acknowledgment of the role of the Upper Mole Farmlands Rural Fringe in **Policy CL8** and the proposed Area of Search for the Crawley Western Link Road (Policy ST4).
- Objections were received from the landowners to their site's partial location outside the Built-Up Area Boundary.
- Support was received from Natural England to **Policy CL9: High Weald Area of**

Outstanding Natural Beauty.

Design & Development Requirements

Comments on this Chapter were received from 10 representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: Horsham District Council, Sussex Wildlife Trust, Woodland Trust, Aberdeen Standard Investments, Natural England, The Planning Bureau Ltd, Inspired Villages, Gladman Developments, Home Builders Federation and Gatwick Airport.

Comments were received on Policies DD1, DD2, DD3, DD4, DD5, DD6 and DD7.

- Support was received for **Policy DD1: Normal Requirements of All New Development**, including reference to Biodiversity Net Gain and protection of trees.
- Suggestion was made for strengthening reference to tree canopies in **Policy DD1**.
- Concerns were raised in relation to criteria set out in **Policy DD1**, including protection of trees.
- Concern was raised to the number of standards, and the thresholds for these, the draft Local Plan requires.
- Concerns were raised regarding the requirements of **Policy DD2: Inclusive Design** and request the council justify its position.
- Objections were received to **Policy DD3: Standards for All New Dwellings (including conversions)** suggesting that it is too prescriptive.
- Support was received for **Policy DD4: Tree Replacement Standards**.
- Concerns were raised against **Policy DD4** both in that the compensation for replacement trees does not go far enough and the financial compensation for replacement trees is considered unviable.
- Gatwick Airport Limited (GAL) outlined support for the inclusion of a dedicated policy relating to aerodrome safeguarding: **Policy DD5: Aerodrome Safeguarding**. GAL has since advised of regulatory changes requiring that Local Plans refer to airport Public Safety Zones. Amendments made to the policy and supporting text respond to this request.
- GAL support **Policy DD6: Advertisements**.
- Sussex Wildlife Trust question whether **Policy DD7: Crossovers** should acknowledge biodiversity and/or flooding benefits to the grass verges.

Heritage

Comments on this Chapter were received from three representors. These included a neighbouring parish council, a planning agent representing a landowner and a specific interest group: Ifield Village Conservation Area Advisory Committee, The Wilky Group, Rusper Parish Council.

Comments were received on Policies HA1, HA2, HA3, HA4, HA5, HA6, HA7 and HA8.

- Support received for the various designations included – particularly within Ifield – as well as the Local Green space designation.
- Request that Village Greens be added to list of Heritage Assets **Policy HA1: Heritage Assets** and that reference is made in the policies to Ifield Village Green.
- Representations agree that the approach set out in **Policy HA1: Heritage Assets and Policy HA5**: Locally Listed Buildings is consistent with national planning policy and guidance.
- Proximity of some actual or potential heritage assets to the proposed Gatwick Green Strategic Employment Location (SEL) is noted and impacts on these will need to be considered as part of the SEL proposal.
- The suggestion was received that Rusper Road should be included on the local heritage list.
- Recommendation that there is greater emphasis in **Policy HA2: Conservation Areas** on the potential for new development and increased densities to have a positive impact on the character and setting of existing Conservation Areas.

Open Space, Sport & Recreation

Comments on this Chapter were received from three representors. These included the County Council, a national government agency and a specific interest group: Woodland Trust, West Sussex County Council and Natural England.

Comments were received on Policies OS2 and OS3.

- Support received for **Policy OS2: Provision of Open Space and Recreational Facilities**, in particular the use of Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.
- Support for the recognition of Public Rights of Way by Crawley Local Plan in **Policy OS3.**
- Concern was raised that **Policy OS3: Public Rights of Way and Access to the Countryside** was not in keeping with the NPPF of requiring PRoW to be protected and enhanced. The representation was also concerned that the Policy was negatively worded in assuming that all development will always adversely affect the network. They noted that they would like to see more of an emphasis on the positive net gains that can be achieved through development.
- Support for the inclusion of **Policy OS3**, but concern raised that the constraints of Public Rights of Way had not been recognised in relation to some of the site allocations.

Infrastructure Provision

Comments on this Chapter were received from three representors. These included the county council, a landowner and planning agent, and a business: West Sussex County Council, The Wilky Group and Gatwick Airport Limited.

Comments were received on Policies IN1 and IN2 (support).

- Amendment to **Policy IN1: Infrastructure Provision** was recommended to clarify that replacement/alternative infrastructure facilities compensating for loss may be located outside the borough boundary.
- Representations considered **Policy IN1** to be sound but recommendations were made for modification to the reasoned justification in order to allow for different approaches to delivery of Infrastructure.
- Support for **Policies IN1 and IN2: The Location and Provision of New Infrastructure** was reiterated by Gatwick Airport Limited.
- Support was expressed for the wording of **Policy IN1: Infrastructure Provision** on the basis that it is worded flexibly so as to leave open potential for S106 contributions to be secured towards Education where appropriate, even if contributions towards meeting cumulative demand arising from small and medium-sized developments (such as are expected to be the norm in Crawley) are more likely to come in the form of CIL. Requests that clarification to this effect is included as part of the viability evidence.
- Support was expressed for **Policy IN3: Supporting High Quality Communications**, though noted that its gigabit ambitions have moved on since the consultation draft, suggesting amendments to supporting text that more accurately reflect the current position.

Economic Growth

Comments on this Chapter were received from 41 representors. These included local residents, neighbouring local authorities and the county council, landowners and planning agents, businesses and specific interest groups: Ardmore/Windsor Land Consortium, WT Lamb Properties, Staminier Group and Elliot Metals/The Simmonds Family, Horsham District Council, The Wilky Group, Gatwick Airport Limited, COIF Nominees Ltd, Aldi Stores Ltd., Aberdeen Standard Investments, West Sussex County Council, Reigate and Banstead Borough Council, Mid Sussex District Council, 22 local residents, Fernhill Riding School, CMA Planning Ltd., Radford Road Community Ltd., a landowner, Horley Town Council, Vectos, HX Properties Ltd. and Crawley Town Centre Bid Board.

Comments were received on Chapter 9 generally as well as specific Policies EC1, EC2, EC3,

EC4, EC5, EC7, EC8, EC9, EC10 and EC11.

- Various objections have been received to the allocation of the Gatwick Green Strategic Employment site, relating to **Policy EC1: Sustainable Economic Growth** and **Policy EC4: Strategic Employment Location**. These include:
    - A number of residents and landowners living close to the site have set out objections. Issued raised include strong concern about the principle and scale of a Strategic Employment Location in a countryside location. Strong concerns relating to impacts on amenity were expressed, and it was questioned how effective any landscape buffering would be. Objections also cited impacts about the scale of new buildings, vehicular movements, flooding, visual intrusion, impact on biodiversity. Representations questioned the need for a Strategic Employment Location. Impact on property values was a strong and consistent message, with a significant number of respondents requesting compensation or the purchase of their properties by the developer.
    - Gatwick Airport Limited objected to the proposed allocation, principally on grounds that the land should remain safeguarded for a future runway, in line with national policy, as the land is required for airport parking. GAL also argue the site is larger than needed, as the economic impacts of Covid-19 are not fully taken account of, and suggest that a continuation of past trends overstates the need – to this end GAL considers that a further review of employment growth findings may be required. To this end, GAL questions why a smaller release of land, less likely to impact on safeguarding, has not been considered. More broadly, GAL argues that any employment need should be met elsewhere in the borough or in nearby authority areas. GAL also raise concerns about traffic growth, including whether Gatwick's passenger growth on its existing runway has been taken into account.
    - RBBC, Horley Town Council, and MSDC have outlined concern relating to traffic access and generation. RBBC advised that the recommended "left turn in and right turn out bans for HGV's at Gatwick Green's access/egress junctions" text from the Transport Study should be included in the policy.
    - RBBC objected to the inclusion of the word "minimum" in front of the site area 24.1ha that is allocated for B8 (with some B2 if needed), considering this to allows for too much uncertainty within the site allocation. Consider it should be removed and potentially replace by "up to".
- Wilky Group are the Gatwick Green Strategic Employment Location promoters and welcome the allocation. Other site promoters have raised objections to the allocation, favouring instead (or in addition to) sites they are promoting. Vail Williams, on behalf of Ardmore/ Windsor Land Consortium, considers its site to represent a natural extension to Manor Royal and therefore a more sustainable location. It also argues that safeguarding should be lifted, enabling its site to come forward. LRM Planning on behalf of WT Lamb Properties, Staminier Group and Elliott Metals/The Simmonds Family support the Strategic employment Location allocation but consider a larger site, including their own land, is needed.
- Support was received for the approach set out in **Policy EC1**, noting that the focus of new land allocations is to provide industrial units at Gatwick Green, with mixed business growth at Manor Royal and at existing employment sites. Horsham District Council considered this complementary to its employment strategy which supports smaller business spaces and start-ups.
- The approach of **Policy EC2: Economic Growth in Main Employment Areas** was supported.
- Concern was expressed that part of a site appeared to be removed from the Manor Royal Main Employment Area – this latter point relates to a mapping error that has since been addressed.
- It was suggested that the **Policy EC2** loss of employment criteria should not apply to town centre locations.
- Representations were received which did not consider **Policy EC2** to be sufficiently supportive of retail foodstores.
- Support was received to the amendment to **Policy EC7: Hotel and Visitor Accommodation** which recognises the airport, like the Town Centre, as a sustainable

location for hotels and excludes it from the sequential test.
- Conversely, objections were also received to this change to Policy EC7, arguing it is against national policy and that the primary objective should be the vitality and viability of the town centre.
- Representations also argued that airport-related parking is appropriate at Town Centre hotels.
- Support was received for **Policies EC8 to EC11 inclusive** from Crawley Town Centre BID.

Gatwick Airport

Comments on this Chapter were received from 14 representors. These included a local resident, a national government agency, the county council, landowners and planning agents, businesses and specific interest groups: CAGNE, Gatwick Area Conservation Campaign, Gatwick Airport Limited, Sussex Wildlife Trust, Natural England, West Sussex County Council, Ifield Village Conservation Area Advisory Committee, HX Properties Ltd., The Wilky Group, Woodland Trust, COIF Nominees Ltd., Ardmore/ Windsor Land Consortium, one local resident and The Arora Group.

Comments were received on Policies GAT1, GAT2 and GAT3.

- GACC and CAGNE object to the principle of any airport growth, and therefore, object to the support **Policy GAT1: Development of the Airport with a Single Runway** provides to growth of Gatwick on its main runway.
- The Sussex Wildlife Trust and Natural England consider the detailed wording of **Policy GAT1**, particularly requesting "impacts should be avoided" and emphasising biodiversity.
- GAL objects to the **Policy GAT1** requirements to minimise impacts and maximise benefits and infrastructure provision.
- Support was received from GAL to **Policy GAT2: Safeguarded Land** in relation to maintaining safeguarding in line with National Policy Aviation Policy Framework 2013, but object to the removal of land for Strategic Employment allocation.
- Support was received from the Strategic Employment Site promoters to the extent of safeguarding being reduced and consider Gatwick Green can be delivered in a manner that is compatible with the future development of a southern runway. Minor mapping adjustments are proposed.
- Landowners in the remaining safeguarded area object to the continuation of safeguarding and sterilisation of potential employment sites, arguing that the Government decision to support Heathrow, the Gatwick Airport Northern Runway proposal, and national carbon reduction commitments remove the need to safeguard land for a further southern runway at Gatwick. Arora request redevelopment of existing sites is permitted.
- WSCC question the conflict with **Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road**.
- Sussex Wildlife Trust and the Woodland Trust are concerned about biodiversity assets, including ancient woodland in the safeguarded area.
- Support was received from GAL to **Policy GAT3: Gatwick Airport Related Parking**.
- Objections were received to **Policy GAT3**, primarily on the grounds of GAL's permitted development rights and role in the provision of airport parking, and the restriction of competition.
- Concern was raised by the Woodland Trust that on airport car parking is inappropriate within ancient woodlands.
- GAL support **Policy GAT4: Employment Uses at Gatwick**.

Crawley Town Centre

Comments on this Chapter were received from four representors. These included a neighbouring local authority, developers, businesses and specific interest groups: Crawley Town Centre Bid Board, Aberdeen Standard Investments, Horsham District Council and Aldi Stores Ltd.

Comments were received on Policies TC1, TC3, TC4 and TC5.

- Responses were generally supportive of the proposed policy approach, considering this

sufficiently flexible to support long-term Town Centre vitality and viability.

- Quod on behalf of Aberdeen Standard Investments supported the flexible approach to the Town Centre but considered the requirement to apply the Policy EC2 'loss of employment' test to represent a conflict with national policy.
- Horsham District Council questioned whether the cumulative 1,500 minimum residential units identified under **Policy TC3: Town Centre Key Opportunity Sites** is sufficiently ambitious in the absence of the Densification Study.
- Planning Potential on behalf of Aldi referred to the amended Class E and the scope for movement within this Use Class, and therefore considered the **Policy TC3** approach to be inconsistent with national policy.

Housing Delivery

Comments on this Chapter were received from 30 representors. These included ten local residents, neighbouring local authorities, national government departments and agencies, utilities providers, landowners and planning agents, businesses and specific interest groups: Inspired Villages, Sussex Ornithological Society, Horsham District Council, Pegasus Group, Southern Gas Networks (SGN), Danescroft (RLP Crawley) LLP, ten local residents, Waverley Borough Council, Gladman Developments, WSCC Property and Asset Management, St. Catherine's Hospice, Tony Fullwood Associates, Homes England, Woodland Trust, Natural England, The Planning Bureau Ltd., Ifield Village Conservation Area Advisory Committee, Gatwick Airport Limited, Mid Sussex District Council, Sussex Wildlife Trust and Crawley Town Centre Bid Board.

Comments were received on the Chapter's introductory text as well as Policies H1, H2, H3, H3a, H3b, H3c, H3d and H3f.

Housing Need (**Policy H1**)

- Objections/concerns were received regarding **Policies H1: Housing Provision and H2: Key Housing Sites**, suggesting that housing needs should be met within Crawley by building at higher densities rather than outside the borough boundary in areas of biodiversity value, which would be the effect of the strategy set out in Policies H1 (Housing Provision) and H2 (Key Housing Sites).
- Recommendations received from older people housing developer in relation to the Local Plan, including the inclusion of bespoke policy/policies setting specific delivery targets, development requirements and allocations in respect of housing for older people, with delivery to be monitored through the AMR.
- Support is received to the 'positive approach to meeting housing need in the Borough' which is reflected in the emerging plan, noting that unmet housing need remains an issue affecting the wider sub-region.
- Concerns raised that the plan must be 'mindful of the cumulative impacts of policy on the viability and deliverability of residential development in the borough'.
- Horsham District Council request that clearer evidence is provided to justify the proposed housing requirement (and resulting level of unmet need) by showing how proposed levels of development (e.g. for the sites in Policy TC3) have been arrived at, including through the completion of the Densification Study. HDC welcomes the increase to the windfall allowance from 55 to 90 dwellings per annum on the basis of evidence set out in the Windfall Statement.
- Objections received to the approach taken in **Policy H1** as 'unsound' as the evidence provided is insufficient to justify a 'supply-led' housing requirement which does not fully meet the borough's identified housing needs. The connection of housing to health and wellbeing as promoted by draft Policy SD2 is highlighted.
- Representations received suggest that in the absence of a clear plan for meeting unmet needs the Plan is unsound and non-compliant with the Duty to Cooperate.
- Concern is raised that the Plan is overly reliant on already-identified sources of housing supply with insufficient work undertaken to identify new sources or establish whether sources already identified can provide increased supply.
- Concerns and objections are received regarding consideration of alternative housing requirement figures within the SA, the proposal in Policy H1 to adopt a 'stepped' housing requirement, the deliverability of the identified 5-year housing land supply.
- Resident representation considers that Crawley's housing need figure needs to be

updated to reflect the most recently published inputs which form part of the standard method, reducing the annual figure from 750 dwellings to 718.

- Resident representation suggests amendments to the proposed five year housing land supply buffer in order to reduce the unmet need passed on to neighbouring authorities in the early part of the Local Plan period.
- Waverley Borough Council note the scale of unmet housing need arising from Crawley and welcomes the acknowledgement that discussions regarding the meeting of this unmet need will be focused on the Northern West Sussex Housing Market Area (HMA). States that Crawley's unmet need should be met within the same HMA and that Waverley Borough is unlikely to be able to take any additional need, being already required to accommodate some unmet need from Woking.
- Agreement is received confirming the council's need figure to be in accordance with the Government's standard method, subject to further updates in line with new affordability ratios. However, representations suggest that a need figure in excess of that resulting from the Standard Method is likely to be appropriate, given the intention of Gatwick Airport to bring the northern runway into regular use, subject to a DCO application. On this basis, it is suggested that the need figure should be revised accordingly before the level of housing delivery within the borough is established.
- The significant unmet need for housing identified in **Policy H1** and the absence of an agreed strategy for meeting this need across the wider Housing Market Area (HMA) is noted. Representations consider that CBC should be undertaking further work to find sites for residential development within the borough before progressing with the submission of the plan.
- Support for the publication of a Statement of Common Ground (SOCG) between CBC, Horsham District Council, Mid Sussex District Council and West Sussex County Council in 2020, identifying the predicted amount of unmet need arising from Crawley, but concern is raised that there is no strategy for distributing that need across the local authority areas within the Northern West Sussex Housing Market Area.

<u>Development outside Crawley's Boundaries</u>

- Concern is raised regarding the removal of Policy H3g (Urban Extensions) from earlier draft and request received that para. 2.33 is amended to include wording giving stronger protection to the High Weald AONB and setting out requirements for Habitat Assessments in other urban extension locations.
- Sussex Wildlife Trust welcome the approach of setting out CBC's expectations in relation to the planning of urban extensions 'At Crawley', but suggests that doing this through Policy (as in former Policy H3g) rather than including this material in the supporting text (as now proposed) would help to ensure a 'consistent and accountable approach'.
- Horsham District Council express concern that this section is not effective because it seeks to shape development outside Crawley's administrative area, which is a matter for the Local Plans for the respective areas. Specifically concerned about suggestion that urban extensions should be meeting unmet needs (including affordable housing) arising from Crawley, given that Horsham District itself has very high assessed need for housing.
- Mid Sussex District Council object to paras. 12.17 to 12.23 on the basis it is not justified or effective as it relates to land outside Crawley's boundary and the specific discussion and requirements do not properly take account of the context of planning within Mid Sussex.
- Support is submitted from the planning agents for the property developers for development of a large site focused on Cottesmore Hotel and Country Club to the south of Crawley – outside of the borough's boundaries ('Cottesmore Village'). States that unmet housing need arising from Crawley lends support to the principle of developing this site, arguing that the Crawley Local Plan should identify the scale of this unmet need, 'its economic significance and the way in which these matters could be addressed'.
- Concern is raised about the detrimental impact of a western link road on the character of Ifield Village Conservation Area, and pedestrian access from the area to the surrounding countryside, with its associated open green space and woodland.
- Rusper Parish Council raise a number of concerns regarding the Land West of Ifield site 'that has been proposed under a duty to cooperate with Horsham District Council', and which 'would impact negatively on the proposed Crawley Local Plan'.

Site Allocations (**Policy H2**)

- Support is received from the landowner for the allocation of **Land adjacent to Desmond Anderson, Tilgate**.
- Support is received from the planning agent on behalf of the landowner for the allocation of **St Catherine's Hospice** current site on Malthouse Road, Southgate. However, concern is expressed that the proposed allocation for older people and those with disabilities is overly prescriptive, and that the policy should allow for more flexibility for potential development of the site for general needs housing. In addition, the representation suggests that the site can accommodate a higher density of development than envisaged in draft **Policy H2**. Detailed comments in relation to the design of the site were also provided.
- Support was received from the planning agent on behalf of a landowner to the allocation of **Land East of Street Hill** the site to deliver 15 dwellings and endorses the SHLAA assessment of the site as being suitable, available and achievable. However, the representations objects to criterion (v): 'avoid harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS)'.
- Objections were received to the proposed allocation of **Land East of Street Hill** as Housing, Biodiversity and Heritage site, on the basis of the sensitivity of the area in ecological and heritage terms, and the relatively limited contribution which it would make to meeting Crawley's housing need.
- Resident representation objects to allocation of **Land East of Street Hill** on biodiversity, amenity, landscape and heritage grounds.
- Homes England, as landowner, proposes that a higher figure of 138 dwellings can be accommodated at **Tinsley Lane Playing Fields**, and also requests flexibility regarding requirements in respect of allotment provision.
- Resident representation expresses concern that the projected dwelling yield for the **Town Centre Broad Location** is expressed as a minimum, whereas this is not so with most other sites/Broad Locations. Concern is raised that this creates a risk that the Town Centre is treated as an 'overfill' area where any amount of residential development is acceptable.
- Support is received for the allocation of **Land SE of Heathy Farm**, with representation recommendations that this allocation be worded flexibly (in respect of dwelling yield and open space requirements) to allow indicative the dwelling quantum to be exceeded where feasible. Changes are recommended to the ratings detailed against the site in the Sustainability Appraisal.
- Woodland Trust object to allocations which include or are close to ancient semi-natural woodlands (**Forge Wood**, **Land SE of Heathy Farm**, **Tinsley Lane Playing Fields**, **Land adjacent to Desmond Anderson**).
- Natural England expresses disappointment regarding allocation of **Land South East of Heathy Farm**, which is identified as deciduous woodland habitat. Notes other biodiversity / landscape / public right of way constraints within or adjacent to other proposed allocations.
- Resident representations objected to allocation of **Land at Henty Close** on various grounds, including impact on local amenity, biodiversity, infrastructure and open space.
- Resident representation objects to proposed allocation of **Rushetts Road Playing Area** on grounds of amenity, existing use, and loss of open space.
- Request received from planning agents on behalf of developers to the consideration of **additional parcels of land in Forge Wood** for allocation as additional housing sites (and their reflection in the Local Plan housing requirement).
- Planning agent on behalf of Southern Gas Networks (SGN) explain that SGN are exploring potential for redevelopment of redundant gas holder sites, including that at Forge Wood, which is planned to be demolished. Expresses concern that status of **gas holder site at Forge Wood** within the draft Plan is unclear, recommending that stronger support is expressed for principle of residential development there, and that further work is undertaken by the council to consider the development potential of the site.

Housing Typologies (**Policies H3, H3a-f**)

- Further evidence is requested (notably completed densification study) to support identified housing requirement. **Policy H3a: Estate Regeneration** should be enlarged on (and informed by the completed Densification Study) to further demonstrate/exploit the

potential for estate regeneration.
- Support received for the 'typology' **Policies H3a: Estate Regeneration**; **H3b: Densification, Infill Opportunities, and Small Sites**; **H3c: Town Centre Residential Sites**; **H3d: Upward Extension**; and **H3f: Open Spaces** in principle.
- Support received for the flexible approach to town centre sites indicated by Policies EC1: Sustainable Economic Growth; EC2: Economic Growth in Main Employment Areas; TC1: Primary Shopping Area; TC5: Town Centre First; H2: Key Housing Sites; **H3c: Town Centre Residential Sites**; and H5: Affordable Housing.
- Support for **Policies H3c: Town Centre Residential Sites**; and **H3d: Upward Extensions** was received from Crawley Town Centre BID, as means of ensuring efficient use of town centre sites and increasing residential densities.
- Objections received to cross-reference to Policy EC2: Economic Growth in Main Employment Areas in **Policies H3c: Town Centre Sites**; and **H3e: Conversions from Commercial/Non-residential Uses**.
- Support in principle received from GAL for **Policy H3d: Upward extensions** and welcomes amendments made in response to previous representations.
- Mid Sussex District Council: Refers back to previous expression of support for **Policy H3d**.

Meeting Housing Needs

Comments on this Chapter were received from five representors. These included landowners, developers and planning agents, businesses and specific interest groups: Home Builders' Federation, The Planning Bureau Ltd., Inspired Villages, Gladman Developments and Gatwick Airport Limited.

Comments were received on Policies H5, H7 and H8.

- Representations from a planning agent on behalf of a landowner recommends that **Policy H4: Future Housing Mix** uses the same wording as in the existing policy.
- Concern is expressed regarding elements of **Policy H4** which are not considered to be positively worded, which are unclear or which are considered to have potential to frustrate the delivery of homes.
- Concern is expressed regarding the proposed market dwelling mix for the Town Centre, and the proposed affordable housing mix, as detailed in supporting text of **Policy H4**. These are considered to require too high a proportion of larger properties, and to have potential to negatively impact development viability.
- Concern is raised about the proposed affordable housing tenure mix in the Town Centre in **Policy H4**.
- The Home Builders Federation refer to the sensitivity of development viability in Crawley and support the proposal in **Policy H5: Affordable Housing** to reduce affordable housing requirements within the Town Centre. This lower level is also supported by other representations.
- The Home Builders Federation suggest that **Policy H5** is updated to reflect First Homes requirements.
- Concern is raised that specialist older persons' housing including sheltered and extra care housing should be exempt from affordable housing requirements in **Policy H5**. Specific technical responses are provided in relation to the council's viability evidence as regards older persons' accommodation. Representations received emphasised the concept of the 'retirement community' as a single planning unit, falling entirely within the C2 use class, where special considerations apply in relation to viability, and where it is not possible to provide on-site affordable housing.
- Variation to **Policy H7: Self and Custom Build** is recommended to link the requirements more closely to up-to-date evidence of demand.
- Concern is raised by house builders that the requirements of **Policy H7** are not fully justified by evidence of demand/supply of self-build and custom-built houses, and are not sufficiently taken account of in the viability assessment prepared in support of the Local Plan. The flexibilities/exceptions provided in the Policy are supported.
- GAL withdraws objection to **Policy H8: Gypsy, Traveller and Travelling Showpeople Sites** on basis that the proposed Plan reinstates a Policy (GAT2) safeguarding land for a

second runway.

Green Infrastructure & Biodiversity

Comments on this Chapter were received from ten representors. These included local residents, landowners, developers and planning agents and specific interest groups: Ifield Village Conservation Area Advisory Committee, The Wilky Group, Woodland Trust, Natural England, Sussex Wildlife Trust, WSCC Property and Assets Management, Sussex Ornithological Society, Home Builders Federation, The Planning Bureau Ltd. and a local resident.

Comments were received on Policies GI1, GI2, GI3 and GI4.

- Support received from a Conservation Area Committee to **Policy GI1: Green Infrastructure**.
- Concern is raised in relation to how it will be possible to retain Green Infrastructure with the demand for housing.
- Woodland Trust welcomes **Policy GI1**, in particular relation to the use of Natural England's Accessible Natural Green Space standard and Woodland Trust's woodland access standard. Also welcomes the inclusion of requirement v11c, for large developments to provide new and/or create links to green infrastructure.
- Support received to Policy GI1 as appropriate and proportionate to the requirements for both green and blue infrastructure in accordance with national policy received from planning agents on behalf of a landowner promoting a site.
- Natural England welcomes the inclusion of the Green Infrastructure policy. Woodland Trust supported **Policy GI2: Biodiversity Sites** and strongly support the policy approach that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are unwholly exceptional reasons and a suitable compensation strategy exists. However, it should be strengthened with regard to buffering of ancient woodland. The policy approach in line with Natural England's standing advice is not believed to be sufficient. Instead, they consider the use of a 50m buffer as a precautionary principle.
- Support for **Policy GI2** from Natural England.
- Natural England highlighted that detrimental impacts to internationally designated sites in the vicinity, which have the potential to occur, need to be considered in relation to potential development within the Plan area and these sites should be referred to.
- Representations received from Natural England confirmed that the Plan should demonstrate how the impacts at Arun Valley SPA and Special Area of Conservation (SAC) and Ramsar sites will be avoided and mitigated.
- Support received from a site promoter for **Policy GI2**, as appropriate and proportionate for addressing Biodiversity and consistent with national policy.
- Sussex Wildlife Trust (SWT) note the amendments have been made based upon their initial comments (to Regulation 19 consultation 2020).
- Suggestion received that the first paragraph of **Policy GI2** should be amended: to remove section relating to past ecological surveys, as some sites may have not been previously surveyed but contain features that are recognised as valuable for wildlife.
- Specific landowner requests for the removal of certain areas of Biodiversity Opportunity Areas under **Policy GI2** – this was a repeated representation from the previous Regulation 19 consultation carried out in 2020.
- Sussex Ornithological Society concerned that there needs to be firmer protection relating to the High Weald AONB.
- Natural England support inclusion of **Policy GI3: Biodiversity and Net Gain**, in particular the need for proposals to demonstrate the securing of a Net Gain.
- Detailed representations from Natural England suggested that **Policy GI3** could be strengthened through the addition 'measurable' when referring to the Net Gain achieved, in line with the NPPF; that net gain should be incentivised on-site in the first instance and showing that the mitigation hierarchy was followed; and demonstrate the securing of management for Net Gain in perpetuity for the life time of the development.
- Natural England advised that SPD should be prepared to provide further details as to how Net Gain should be delivered and measured.

- Representations received from the Conservation Area Committee suggested that there should be a requirement for ecological studies of proposed development sites to be made public, and knowledge from local community who know the area should be sought after in **Policy GI3**.
- Representation from a site promoter supporting **Policy GI3** as provide appropriate and proportionate requirements to address biodiversity and net gain, and consistent with national policy.
- Concerns raised by SWT to **Policy GI3** suggest that it fails to adequately address what is required where BNG cannot be secured on-site. Suggests that CBC has a strategic plan in place to deliver BNG that is required off-site, and to ensure that gains are strategic and maximised.
- Representations received from planning agents on behalf of landowners are supportive of **Policy GI3** to deliver Biodiversity Net Gain which is in accordance with the Environment Bill (now The Environment Act).
- Concern is raised that the wording of **Policy GI3** does not make provisions for when net gains cannot be achieved on-site whether that be partially or in full, and suggests wording that could be used to inform such circumstances.
- Concern is raised that **Policy GI3** is repetitive of other policies in the Plan, in particular relation to tree replacement planting and landscaping and suggests that these two points should be removed.
- The Home Builders Federation object to **Policy GI3**, considering it to not be consistent with national policy.
- Support received for the commitment to achieving a minimum of 10% Net Gain.
- Concern that clarity is needed in **Policy GI3** in relation to the contribution of one new tree per new dwelling (or equivalent off-site contribution) to confirm that either contribution is required or it is not. Concern is raised that the ambition to increase in tree cover in the borough may come as an obstruction to building at higher densities, and particularly may not be feasible for new urban developments on constrained sites. It was suggested that there should be a reduction in the number of additional tree planting in urban areas, and a separate cost for tree planting should be included in the Crawley Local Plan Review: Whole Plan Policies & Community Infrastructure Levy Viability Assessment.
- Strong support was received for the designation of Ifield Brook Meadows and Rusper Playing Fields as Local Green Space (**Policy GI4: Local Green Space**), with them both being valued and important local features.
- Resident representations received raised objections to development of Ifield Brook and Ifield Golf Club, with development impacting the environment and nature; historic flooding in the area and future flood risk; benefits that the area brings to peoples physical and mental health; and an increase in people in the area will increase congestion and traffic and place additional burden on Crawley.
- Rusper Parish Council raised concerns about the Land at the West of Ifield: the proposed site would negatively impact upon Crawley's Local Plan.

Sustainable Design & Construction

Comments on this Chapter were received from three representors. These included a national government department and agency, landowners, developers and planning agents: Ardmore Ltd, The Planning Bureau Ltd. and Natural England.

Comments were received on Policies SDC1, SDC2 and SDC3.

- Representations from planning agent on behalf of landowner promoting a site set out how their masterplan area could be developed in accordance with the requirements of draft **Policy SDC1: Sustainable Design & Construction**, **SDC2: District Energy Networks**, and **SDC3: Tackling Water Stress**.
- Representations consider that it should be left up to the developer how best to achieve the 19 per cent carbon reduction target detailed in **Policy SDC1** in respect of new dwellings.
- Concern raised by representations received that the allowance made in the Local Plan Viability Assessment for enhanced sustainability standards is 'stretched thin'.
- Natural England provided comments on **Policy SDC3**, though this feedback has largely

been superseded by the need to address Water Neutrality within the Local Plan.

Environmental Protection

Comments on this Chapter were received from five representors. These included utilities providers, landowners, developers and planning agents and businesses and specific interest groups: The Wilky Group, SGN, Gatwick Airport Limited, Pegasus Group, Danescroft (RLP Crawley) LLP and Sussex Wildlife Trust.

Comments were received on Policies EP1, EP3, EP4 and EP6.

- Representations received from a site promoter considers **Policy EP1: Development and Flood Risk** to provide appropriate and proportionate requirements for addressing flood risk and surface water drainage considerations and is consistent with National Policy.
- Representations from a planning agent on behalf of a landowner considers that its site should be allocated for residential and raise objection to the SHLAA having not taken this site forward on due to concerns of flood risk and land contamination (**Policy EP3: Land and Water Quality**).
- Gatwick Airport Limited, along with planning agents representing landowners and developers, provided detailed comments relating to the specific noise metrics used in **Policy EP4: Development and Noise** and the **Noise Annex**.
- Representations from planning agents on behalf of a landowner question whether noise metrics should be included within the Local Plan.
- Representations received from Sussex Wildlife Trust requested amendment to **Policy EP6: External Lighting** to avoid unacceptable impacts on biodiversity.

Sustainable Transport

Comments on this Chapter were received from 15 representors. These included a local resident, a neighbouring local authority, national government departments and agencies, the county council, landowners, developers and planning agents, businesses and specific interest groups: Ardmore/Windsor Land Consortium, Highways England, The Wilky Group, Gatwick Airport Limited, Home Builders Federation, The Planning Bureau Ltd., Crawley Town Centre Bid Board, a local resident, Sussex Ornithological Society, West Sussex County Council, Horsham District Council, Ifield Village Conservation Area Advisory Committee, Sussex Wildlife Trust, Woodland Trust and COIF Nominees Ltd.

Comments were received on the Chapter in general as well as specific Policies ST1, ST2, ST3 and ST4.

- Representations from planning agent on behalf of landowner promoting a site set out how their masterplan area can be delivered in consistency with Local Plan objectives on sustainable transport (**Policy ST1: Development and Requirements for Sustainable Transport**).
- Representations received from Highways England (now National Highways) confirm that work is ongoing as part of the Transport Study to establish the impact of the Local Plan on the strategic road network.
- Representations received from a site promoter considers that the approach set out in **Policy ST1** is consistent with national and CBC corporate policy and strategies, and sets out that the proposed Gatwick Green allocation (promoted by the representor) is consistent with this policy and with **Policy ST2: Car and Cycle Parking Standards**.
- Representations received from Gatwick Airport Limited (GAL) raise no objection to draft **Policy ST1**.
- Support is received from planning agents on behalf of landowners for the 'parking behaviour zones' identified in the **Parking Standards Annex**, referred to in **Policy ST2**.
- Concern is raised by the Home Builders Federation about lack of specific allowance within the Local Plan Viability Assessment for cost of providing electric vehicle charging points.
- The inclusion of local standards for installation of EV charging points is queried given that national requirements are being introduced via Building Regulations.
- Support is received for the element of flexibility in the **Parking Standards Annex** (referred to in **Policy ST2**) in respect of vehicle parking for older persons'

accommodation.
- Concern is expressed regarding the requirement for a quota of active EV charging points as part of parking provision. As an alternative it is suggested that cabling could be provided to parking spaces, to be used for 'live' charging points at a later stage as needed. Sets out that cycle parking should not be required for residents of specialist older persons' accommodation.
- GAL confirm that following modification of **Policy ST3: Improving Rail Stations**, the previous objection to the policy no longer applies.
- Representations from the Crawley Town Centre Business Improvement District support **Policy ST3** in relation to Crawley Station in terms of the scope for enhanced pedestrian/cycling accessibility, better public transport provision, and better integration with the main shopping area.
- Resident Representations suggest the playing fields which would be affected by a southern runway at Gatwick Airport and/or a new link road for new development at the West of Ifield (**Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road**) should be replaced through the Local Plan.
- Sussex Ornithological Society confirmed their representations to **Policy ST4** made as part of the Regulation 19 2020 consultation continue to stand.
- Representations from WSCC raise concern that Policy GAT2: Safeguarded Land for the potential future additional wide spaced runway as per the Gatwick Airport Master Plan is in conflict with **Policy ST4** as substantial sections of the ST4 area lies within the GAT2 safeguarded area.
- Horsham District Council (HDC) support **Policy ST4**, subject to the need for the corridor for any future relief road to be agreed jointly with HDC as most of the route would be within the administrative area of Horsham.
- Objections received from planning agent on behalf of a site promoter to **Policy ST4** in its current form and the Proposals Map allocation as well as the principle of safeguarding land for a relief road, as premature.
- Representations received from the Conservation Area Committee to **Policy ST4** acknowledge its purpose, but raise concerns regarding the environmental impacts.
- GAL maintains its previous objection to **Policy ST4** and confirms, that since the reinstatement of the policy safeguarding land for future runway expansion to the south of Gatwick Airport, this is now strengthened by the inherent inconsistency between Policies GAT2 and ST4.
- Representations received from Sussex Wildlife Trust (SWT) raise concern as to the need for the link road and its impacts on biodiversity. The broad area appears to cover areas of known biodiversity value including a Local Wildlife Site and ancient woodland. SWT does not feel the current policy wording reflects the clear need with the NPPF section 175 to follow the mitigation hierarchy and avoid impacts in the first instance.
- Support received from the Woodland Trust to the supporting text to **Policy ST4** confirming new highways crossing across Ifield Brook Meadows would be wholly unacceptable.
- Concern received from the Woodland Trust to **Policy ST4** that the search area for the proposed link road includes ancient woodland at Rowley Wood ASNW.
- Representations received from Rusper Parish Council raise concerns that the western link road would have an adverse effect on Ifield Brook Meadows as the proposals seem to have cycle ways through parts of this Conservation Area.

Noise Annex

Comments relating to the Noise Annex were received from one representor: a local resident.

- Concern the contour map is not clear enough.

Other detailed representations were received in relation to noise and the Noise Annex which have been detailed above in Environmental Protection – Policy EP4: Development and Noise.

Duty to Cooperate

Comments relating to the Duty to Cooperate were received from five representors: a local resident, Squires Planning, Gladman Developments Ltd, Reigate and Banstead Borough

Council and The Sogno Family Trust.

- Resident Representations consider the Duty to Cooperate has failed, as it gives Crawley insufficient control of land beyond its built-up edges.
- Representations from Reigate and Banstead Borough Council confirms the Statement of Common Ground agreed between the two authorities and signed in February 2021.
- Concerns are raised by planning agents for landowners in relation to the extent of Statements of Common Ground agreed by the council and its neighbouring authorities, suggesting the Local Plan fails in meeting the Duty to Cooperate.
- Representations suggest there needs to be updated Statement of Common Grounds agreed which confirm the extent of unmet needs that can be accommodated by the neighbouring authorities.

Sustainability Appraisal/Strategic Environmental Assessment

Comments on the Sustainability Appraisal/Strategic Environmental Assessment were received from seven representors: Sussex Ornithological Society, The Wilky Group, Reigate and Banstead Borough Council, HX Properties Ltd., Danescroft (RLP Crawley) LLP, Gladman Developments and Squires Planning.

- Sussex Ornithological Society confirmed their representations to SA/SEA made as part of the Regulation 19 2020 consultation continue to stand.
- Representations received from a site promoter considers consider that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that specifically its assessment in relation to **Strategic Policies EC1** and **EC4** and **Policy GAT2** is sound.
- Representations from Reigate and Banstead Borough Council raise concern that the SA/SEA does not assess the sustainability of the option of not allocating a land to meet identified B8 need in respect of **Policy EC4**. This is considered a failure of the SA/SEA to consider all reasonable options.
- Objections are received from a planning agent on behalf of a car park operator the SA/SEA is deficient, inadequate and unsound where the appraisal concerns **Policy GAT3**.
- Concern is raised that the evidence base was incomplete at the time of the SA/SEA preparation and this respect the conclusions of the SA cannot be relied upon and a further SA should be undertaken once the evidence base is complete.
- Representations highlight that the results of the SA process need to clearly justify the policy choices, in particular, in meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected.
- Concerns are raised by a planning agent on behalf of a residents' group in relation to how the SA/SEA assesses **Policy EC4** has been considered and the final policy solution arrived at. In particular, concerns are raised in relation to: insufficient evidence to prepare SA; the spatial approach to meeting Crawley's land use needs; prejudicing the delivery of a second runway, should it be required by national policy; assessment of Economic Growth Options; and the assessment of Policy Option.

Local Plan Map

Comments on the Local Plan Map were received from five representors: COIF Nominees Ltd., Ardmore/Windsor Land Consortium, The Wilky Group, TS Leisure and Property and West Sussex County Council.

- Representations from planning agents on behalf of landowners promoting sites for development request that the **Built-Up Area Boundary (Policy CL8)** is extended to include their sites.
- Representations received from the site promoter of **Gatwick Green Strategic Employment Site (Policy EC4)** requests changes made to the Local Plan Map in relation to their site.
- Representations promoting **new site allocations** were received.
- Representations received from WSCC request the **Minerals Safeguarding Area** is

shown on the Local Plan Map.
- Representations from a planning agent on behalf of a landowner promoting a site for development request that the **Manor Royal Boundary (Policy EC2)** is extended to include the whole of their site.
- Objections are received to the **safeguarding of land for Gatwick Airport** (**Policy GAT2**).

Habitats Regulations Assessment

Comments on the Habitats Regulations Assessment Screening Report were received from three representors: Reigate & Banstead Borough Council, Mid Sussex District Council and Natural England.

- Reigate and Banstead Borough Council (RBBC) acknowledge the draft HRA takes into account their previous representations made to the Regulation 19 2020 consultation.
- RBBC do not dispute the conclusions that the Bechstein's bat habitat (at Mole Gap to Reigate Escarpment Special Area of Conservation) will not be affected by the Local Plan and habitat loss and fragmentation will not be considered further in the HRA process, in line The Bat Conservation Trust ("BCT") guidance on thresholds for Core Sustenance Zones ("CSZ").
- RBBC do not dispute the decision that the site will not be considered further in the HRA process in terms of public access and disturbance, but recommend that strong consideration is taken for any large development sites.
- RBBC raise significant concern with regards to potential impacts from **Policy EC4 Strategic Employment Location** site development as it does not include freight traffic to/from the planned logistics site, which will be a much more significant part of the site traffic than employees' cars.
- Mid Sussex District Council remain concerned about the HRA work undertaken to support the Crawley Local Plan as it appears that no detailed transport modelling, air quality modelling and ecological interpretation to assess any impact on the Ashdown Forest SAC has been undertaken and considers that this modelling work and the next version of the HRA will need to be undertaken prior to submission of the Local Plan for examination.
- Natural England highlight the issue of Hardham groundwater abstraction serving Southern Water's Sussex North Water Resource Zone, and emerging evidence which indicates that an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar features could not be excluded with certainty. Whilst the adverse effect remains or is uncertain, development in Crawley must be certain not to add to this adverse effect. This will need to be tested through Crawley Local Plan's HRA, and again we welcome ongoing involvement in this process and the work that Crawley has undertaken thus far to assess this impact through the HRA. Once this has been completed it will support the test of soundness for the Local Plan. This requirement should be an essential target in the Sustainability Appraisal. With clear links to the quantum of housing numbers coming forward.

Viability Assessment

Comments relating to the Viability Assessment were received from two representors: The Planning Bureau Ltd. and Gladman Developments.

- Concern was raised relating to the delay in publishing the Viability Assessment.
- Concern was raised regarding the preparation of the Local Plan ahead of the Viability Assessment to ensure it was fully informed by the outcomes to ensure proposed policies do not place such additional burdens which would render developments unviable.

Strategic Housing Land Availability Assessment

Comments relating to the Strategic Housing Land Availability Assessment was received from one representor: SGN.

- North East Sector, Gas Holder site (Site Ref: 73): the council should work positively and proactively to overcome constraints and brownfield land within the Forge Wood Neighbourhood should be defined and classified as residual land in which the principle of

development is supported. A further assessment of the site and wider area should be undertaken to determine its development potential.

4.17 Concerns were raised by one representor in relation to the Local Development Scheme and Statement of Community Consultation.

4.18 No comments were received on the Planning Obligations Annex, Housing Trajectory, Employment Land Trajectory, Infrastructure Plan or any other Key Document or evidence base document.

5. Next Steps

4.1 The Plan the council submits to the Secretary of State for examination should form the Local Plan the council considers to be legally compliant and 'sound'[6]. A formal decision has to be made at Full Council to agree the draft Plan for publication and submission to the Secretary of State for its independent examination, before it can be adopted as the borough's Local Plan for planning decision making.

4.2 As set out in the earlier sections of this Consultation Statement, a draft Local Plan has been considered and approved by the Council previously at the meetings of the Full Council held on 16 December 2019 and 16 December 2020. Following the Full Council decisions, the Local Plan Review was subject to formal public consultation, in accordance with Regulation 19, which took place between:

- 20 January until 2 March 2020; and
- 6 January 2021 until 30 June 2021.

4.3 It had to be considered a second time in December 2020 (and subject to a further Regulation 19 Publication in 2021) due to advice relating to the government's aviation policy, which required the council to reinstate most of the land safeguarded for an additional runway to the south of Gatwick Airport.

Further Publication (Submission) Consultation (Regulation 19)

4.4 Progression of the Local Plan to Submission was subsequently delayed due to the work required in order to meet the Habitats Regulations specifically in relation to water supply constraints[7]. However, there is now sufficient information available to address these concerns through the Local Plan Review.

4.5 Key changes which have been made since the published January 2021 Draft Local Plan Review are associated with:

- Water Neutrality Requirement and consequential Viability Update;
- Amendments related to other evidence document updates;
- Response to representations made during the 2021 Regulation 19 Consultation;
- Passing of time – factual & data updates;
- National Policy Updates.

4.6 On this basis, the amended draft Plan is to be considered again at Full Council. Subject to Full Council approval, a further stage of Regulation 19 Publication Consultation will take place.

4.7 The Local Plan being taken through Full Council and to be published for Regulation 19 consultation is a new Submission Draft Local Plan. However, much of the draft Local Plan Review and its Key Documents and Evidence Base are already established and remain the same as approved by Full Council in December 2020.

[6] i.e. Positively Prepared; Justified; Effective; and Consistent with National Policy (paragraph 35, National Planning Policy Framework, February 2019, MHCLG)
[7] Water Neutrality in Crawley Webpage: Water neutrality in Crawley | Crawley GOV

4.8 The reports and "advertising" of the formal consultation will clearly explain it is an amended Local Plan due to Water Neutrality and the passing of time. However, representations will be able to be made on the whole document (for example, objectors may want to highlight other matters they believe have changed).

Representations to Earlier Consultations

4.9 Whilst the council's original responses to the Regulation 18 representations have been published as part of this Consultation Report (Appendix 2), it should be noted that these were considered in the context of the preparation of the initial Regulation 19 consultation stage (January 2020). Therefore, the council's responses may not reflect the changes which have been made subsequently to the Local Plan following the close of the Initial Publication Consultation and which may supersede the council's previous intentions.

4.10 Furthermore, the council has not directly responded to representations made during either of the two previous Publication Regulation 19 Consultations (January 2020 and January 2021) as part of this Consultation Statement document. However, these have all been considered in depth as part of the updates to the Local Plan and have resulted in changes where considered appropriate. Representations duly made previously during the consultation carried out between January and March 2020 and January and July 2021 will be retained and submitted to the Inspector in their entirety, unless new representations clearly state they supersede those made previously.

4.11 Representations received during the Initial Publication Consultation (2020) are set out verbatim in a standardised tabular form in Appendix 4; and from the Additional Publication Consultation (2021) are set out verbatim in a standardised tabular form in Appendix 6 of this Consultation Statement.

4.12 On this basis, it will not be necessary for any representor to resubmit previously made comments, or comments made on elements of the Local Plan which have not been subject to any change since the previous Regulation 19 Consultation.

How the consultation will be conducted

4.13 For this Publication Stage of the Local Plan Review, the council will publish the following Consultation Final Draft Documents for scrutiny and comment:

- Draft Submission Crawley Local Plan 2024 – 2040 (January 2023)
- Local Plan Map
- Sustainability Appraisal/Strategic Environment Assessment Draft Report
- Habitat Regulations Assessment Draft Report
- Draft Consultation Statement
- Draft Infrastructure Plan
- Duty to Cooperate Statement & agreed Statements of Common Ground
- Along with any new or updated evidence documents.

4.14 These will be available online on the council's dedicated website: https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-review

4.15 Paper copies of the documents will be made available in the Town Hall and Crawley Library.

4.16 A Representation Form will be available to download for representations to be received. For this consultation, representors will be asked to provide their

contact details, and will be asked to confirm whether they consider the Plan to be:

- ✓ Legally Compliant
- ✓ Sound

4.17 Representors will be expected to provide justification to support their position and requested to make suggestions as to how any flaws they consider the Plan to have could be rectified.

Examination Stage

4.18 As part of the Local Plan examination process, due regard must be given to the outcomes of the Early Engagement and Publication consultations. Therefore, following the close of this formal stage of public consultation, all feedback received will be considered and the messages from the consultation will be collated and summarised.

4.19 Responses to the issues raised will be provided and the outcomes of the consultation from all three stages of Regulation 19 Consultation, along with the Early Engagement, will be submitted alongside the draft Local Plan to the Secretary of State. These will inform the appointed Planning Inspector and will be considered as the Plan is taken forward through its independent examination.

Stage	**Date**
Early Engagement consultation	15 July 2019 – 16 September 2019
Full Council	16 December 2019
Initial Publication consultation	20 January – 2 March 2020
Additional Publication consultation	6 January – 30 June 2021
Further Publication (Submission) consultation	9 May – 20 June 2023
Submission	July 2023
Examination in Public	September – November 2023
Adoption	July 2024