

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 has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>1</sup> and the council's adopted Statement of Community Involvement (SCI)<sup>2</sup>.
- 1.2 The council has begun its review on the current Local Plan and will be carrying out a further consultation exercise to see what people think of its draft future policies. The Local Plan is a document that outlines how the town should be planned and developed over a 15 year period following its adoption. This consultation is a key part of Crawley Borough Council's Local Plan Review process. The consultation will be undertaken with people living and working in Crawley, and those with particular interests, to better understand how they think the town should develop by 2037.
- 1.3 This stage of consultation forms a second full stage of the statutory 'Publication' consultation for the Local Plan Review. It follows two earlier formal stage of public consultations, which were undertaken between July and September 2019 (Early Engagement) and January and March 2020 (Initial Publication Consultation).
- 1.4 These main stages of public consultation are established by the council's adopted Local Development Scheme<sup>3</sup>.

Consultation Period(s)	Date
<b>Early Engagement Stage (Regulation 18)</b>	
Issues, Options and Preferred Approach Public Consultation	15 July 2019 – 16 September 2019
<b>Publication Stage (Regulation 19)</b>	
Initial Publication Consultation	20 January 2020 – 2 March 2020
Second Submission Consultation	6 January 2021 – 17 February 2021

- 1.5 The Publication Consultation is the 'final' stage of consultation undertaken on what the council considers to be its "Sound" Local Plan for the purposes of submission to the Secretary of State for independent examination. This second stage of Publication Consultation being carried out for the Local Plan reflects key changes to the Local Plan since its initial Publication Consultation undertaken at the start of 2020.

<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012:  
<http://www.legislation.gov.uk/uksi/2012/767/contents/made>

<sup>2</sup> Crawley Borough Council Statement of Community Involvement: A guide to participating in the planning system (June 2020) CBC: [SCI June 2020](#)

<sup>3</sup> Local Development Scheme 2020 – 2023 (December 2020) CBC:  
<https://crawley.gov.uk/planning/planning-policy/engagement-and-monitoring/local-development-scheme>

## 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	<i>Stage one – early engagement</i>
	<p>Gather evidence, including independent studies and advice, to input and support production of the document.</p> <p>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.</p> <p>Consider if issues identified can be addressed by the plan and make available feedback to show how responses have been considered.</p> <p>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.</p>

- 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:

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

- 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<sup>4</sup>, 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.

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<sup>4</sup> 15 July until 16 September 2019

- 2.11 These were available online on the council's dedicated website: **[crawley.gov.uk/crawley2035](http://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 Ruspur/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?
<p><b>General:</b>  <i>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.</i></p>	

Main Issues	How this was taken into account?
<p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>• Need for the policies to be simpler and avoid duplication.</li> <li>• Support for the Vision.</li> <li>• Importance of, and support for, continual and effective Duty to Cooperate.</li> <li>• 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.</li> <li>• Highlighting the importance of linking with the County's Minerals and Waste Planning.</li> <li>• 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.</li> <li>• Concern with the use of the "At Crawley" study area.</li> </ul>	<p>The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies.</p> <p>Amendments have been made to remove unnecessary duplication and clarify purpose of the character and design policies.</p> <p>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.</p> <p>The purpose of the "At Crawley" plan has been clarified and the key has been amended for the avoidance of doubt of its intentions.</p>
<p><b>Sustainable Development:</b>  <i>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.</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>• General support for the sustainable development and well-being policies.</li> <li>• Strengths of Crawley include facilities, transport links (including Gatwick), balance demographic, vibrancy, good parks and leisure facilities.</li> <li>• Weaknesses of Crawley include maintenance, air and noise pollution, cycle network.</li> <li>• Concerns raised regarding health services, and particularly capacity of GP provision.</li> <li>• Strong support for the bus network – need to extend spatially and time (to support night-time economy).</li> <li>• Promotion of including water quality and water resources into Sustainable Development policy.</li> <li>• Promotion of including wildlife, heritage and sports in to Healthy Lifestyles and Wellbeing policy.</li> </ul>	<p>Amendments have been made to detailed policies to address matters and suggestions raised.</p>
<p><b>Character &amp; Design:</b>  <i>Comments were received from 36 individuals and organisations/businesses on the Character &amp; 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</i></p>	

Main Issues	How this was taken into account?
<p><i>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).</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>• Density and Design/Character policies generated debate, with both positions of support and objection being received from both residents and developers.</li> <li>• Support for strategic urban design and integrated landscaping policies.</li> <li>• 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.</li> <li>• Concern raised in relation to the implementation of the transport and access approach. Support received for encouragement of active design and travel.</li> <li>• Detailed questions were raised in relation to the application of the Density Policy, along with some support received and some objections.</li> <li>• Concern of over-prescription in relation to character assessments and design tools from agents acting on behalf of landowners/developers.</li> <li>• 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.</li> <li>• Detailed comments provided on Crossover, Advertisement and Aerodrome Safeguarding policies.</li> <li>• Suggestions include inclusion of wording relating to open space, landscaping and ecological networks.</li> </ul>	<p>The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies.</p> <p>Amendments have been made to remove unnecessary duplication and clarify purpose of the character and design policies.</p> <p>Amendments have been made to the density levels.</p> <p>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.</p> <p>Amendments have been made to detailed policies to address matters and suggestions raised.</p>
<p><b>Landscaping &amp; Landscape Character:</b></p> <p><i>Comments were received from 32 individuals and organisations/businesses on the Landscape &amp; 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).</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>• Concerns raised around designations impacting on future development potential and landowner concerns.</li> <li>• Strong support for the borough’s existing soft landscaping.</li> <li>• Support for the tree retention and replacement policy, as well as concern regarding the method of its calculation and the need to consider it as part of viability assessment.</li> <li>• 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</li> </ul>	<p>The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies.</p> <p>Amendments have been made to detailed policies to address matters and suggestions raised.</p> <p>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</p>

Main Issues	How this was taken into account?
<p>working on behalf of landowners of sites within this area.</p> <ul style="list-style-type: none"> <li>Comments made on the High Weald Area of Outstanding Natural Beauty policy and links to the Management Plan priorities.</li> </ul>	<p>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.</p>
<p><b>Heritage:</b>  <i>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.</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>Recommendations to make more explicit reference to archaeological assets.</li> <li>Support for the heritage policies with recommendations on detailed wording in Heritage Assets, Conservation Areas, Listed Buildings and Historic Parks and Gardens policies.</li> <li>Links between trees and ancient woodland as heritage, biodiversity and landscape assets.</li> </ul>	<p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p> <p>A new archaeology policy has been introduced.</p> <p>Links have been made in relation to trees and ancient woodland and their heritage value, and cross-reference made to the biodiversity policy.</p>
<p><b>Open Space, Sport &amp; Recreation:</b>  <i>Comments were received from 30 individuals and organisations/businesses on the Open Space, Sport &amp; 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.</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>Strong support for the borough's parks and open spaces.</li> <li>Requests to strengthen policy wording in relation to public rights of way and multi-use routes.</li> <li>Comments received regarding need to maintain, protect and enhance use of accessible semi-natural greenspace provision.</li> <li>Requests for indoor sports facilities including skating rinks and bowling alleys and disabled sports facilities.</li> </ul>	<p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p> <p>Amendments made to the public rights of way policy in accordance with the technical and specialist advice.</p>
<p><b>Infrastructure Provision:</b>  <i>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 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.</i></p> <p><i>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.</i></p>	

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Concerns raised around designations impacting on future development potential and landowner concerns.</li> <li>Health and education issues raised by local residents and the infrastructure providers/agencies.</li> <li>Support for infrastructure policies, regarding maintenance and where they are located outside of Crawley (but serve Crawley).</li> <li>Information provided regarding specific infrastructure services and networks (including water, waste water, energy, education, highways, fire and rescue, and health).</li> <li>Request for financial contributions to be sought from development to support education and health needs.</li> <li>Detailed wording suggested for the communications infrastructure policy.</li> </ul>	<p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p> <p>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.</p> <p>Inclusion of reference to securing contributions towards education and health has been included in the policy.</p> <p>Amendments made to the communications policy in accordance with the technical and specialist advice.</p>
<p><b>Economic Growth:</b>  <i>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.</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> <li>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.</li> </ul>	<p>This chapter has been amended to reflect the updated evidence from the Economic Growth Assessment.</p> <p>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.</p> <p>The Skills Policy has been amended and greater detail regarding the planning obligations expectations from developers has been included in the Planning Obligations Annex.</p>
<p><b>Gatwick Airport:</b>  <i>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 Group, Horsham District Council and six agents on behalf of developer/landowners and one business.</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>Support for retaining safeguarding and support for removing safeguarding from the public. Gatwick Airport</li> </ul>	<p>The draft Local Plan proposes to remove safeguarding and replace a wider area “the Area of Search” with the commitment to</p>

Main Issues	How this was taken into account?
<p>Limited support retaining safeguarding and landowner submissions requiring the removal of safeguarding for other economic development.</p> <ul style="list-style-type: none"> <li>• 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).</li> <li>• 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.</li> </ul>	<p>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.</p> <p>The draft Local Plan maintains the on-airport car parking approach.</p> <p>The draft Local Plan maintains the Airport boundary to that relating to the council's own records.</p>
<p><b>Crawley Town Centre:</b>  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.</p> <p>Specific comments were received on Policies TC2, TC3 and TC5 as well as general observations on Crawley Town Centre.</p>	
<ul style="list-style-type: none"> <li>• Limited responses overall in relation to the Town Centre.</li> <li>• Strong support for Crawley Town Centre facilities and accessibility.</li> <li>• Desire for greater offer and particular shops.</li> <li>• Support the need for neighbourhood facilities policy, but concern the policy should not be used for residential developments to provide the facilities required.</li> <li>• Highlighting the need for town centre impact testing to include other town centres beyond Crawley town centre from RBBC (i.e. Redhill).</li> </ul>	<p>Amendments have been made to the Town Centre chapter reflect the updated emerging evidence position.</p> <p>Detailed amendments have been made to the Key Opportunities Sites policy for the purposes of clarity.</p> <p>Confirmation has been included to the need for impact testing for other centres beyond Crawley Town Centre.</p>
<p><b>Housing:</b>  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, 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).</p>	

Main Issues	How this was taken into account?
<p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>• 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).</li> <li>• Some concerns from neighbouring authorities raised over the remit and wording of the draft urban extensions policy.</li> <li>• 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.</li> <li>• 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.</li> <li>• Opposition to building housing on open spaces.</li> <li>• 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).</li> <li>• New site at St. Catherine’s Hospice promoted for housing or care home.</li> <li>• 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.</li> <li>• Comments received on detailed policies for Build to Rent and Custom and Self-Build Housing.</li> <li>• 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.</li> </ul>	<p>Amendments have been made to the housing chapter reflect the updated evidence position.</p> <p>This includes changing the affordable housing tenure split to 75/25 rental/intermediate (from the existing 70/30 split).</p> <p>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).</p> <p>Some changes have been made to better clarify the purpose of the urban extensions policy.</p>
<p><b>Green Infrastructure &amp; Biodiversity:</b>  <i>Comments were received from 22 individuals and organisations/businesses on the Green Infrastructure &amp; 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).</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>• Concerns raised around designations impacting on future development potential and landowner concerns.</li> <li>• Support for the Green Infrastructure and Biodiversity policies.</li> <li>• Suggested detailed wording for the Green Infrastructure policy and the Biodiversity policies.</li> </ul>	<p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p>

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Support for Biodiversity Net Gain – recommendations to strengthen the requirement, and concern regarding ensuring this is considered properly as part of the viability assessment.</li> <li>• 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).</li> <li>• Concern from the landowner that the Local Green Space designation goes further than national policy.</li> </ul>	
<p><b>Sustainable Design &amp; Construction:</b>  <i>Comments were received from 19 individuals and organisations/businesses on the Sustainable Design &amp; 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).</i></p> <p><i>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.</i></p>	
<ul style="list-style-type: none"> <li>• Support for the need to encourage sustainable energy provision.</li> <li>• Support for the tightening of water usage requirements.</li> <li>• Objections to requiring higher than national requirements.</li> </ul>	<p>Detailed amendments made to the chapter and policies to address comments and technical suggestions received.</p>
<p><b>Environmental Protection:</b>  <i>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.</i></p> <p><i>Specific comments were received on paragraph 15.18 and Policies EP1, EP2, EP3 and EP4 as well as general observations on Environmental Protection.</i></p>	
<ul style="list-style-type: none"> <li>• Support for the flooding policies.</li> <li>• Concerns regarding air quality – particularly in relation to air and road transport, as well as from Pease Pottage compost facility.</li> <li>• 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).</li> </ul>	<p>Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current national and local environmental health advice.</p>
<p><b>Sustainable Transport:</b>  <i>Comments were received from 48 individuals and organisations/businesses on the Sustainable Transport 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,</i></p>	



Main Issues	How this was taken into account?
<p><i>Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group and five agents on behalf of developer/landowners.</i></p> <p><i>Specific comments were received on paragraphs 16.1, 16.14 and on every policy in this Chapter (Policies ST1, ST2, ST3 and ST4).</i></p>	
<ul style="list-style-type: none"> <li>• Support for sustainable transport – strong support for the bus network and Fastway and improvements strongly supported.</li> <li>• Need to improve the cycle network and pedestrian access in the town.</li> <li>• Concern about existing road and junction capacity.</li> <li>• 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.</li> </ul>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>

**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)

<b>CONSULT</b>	<b><i>Stage two – publication</i></b>
	<p>Draw upon evidence and feedback received through early engagement to produce a final draft planning document.</p> <p>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.</p> <p>Publicise consultation and ensure that all documents are readily available to view to make sure that everyone has sufficient opportunity to comment.</p>

- 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:
  - 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)
  - 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, Ardmere 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 within 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, 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 reflect 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, 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 G11, G12, G13 and G14.*

- Objection received in relation to **Policy G11: 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 G11**.
- Comments requesting the term soft landscaping be explained (previously in **Policy DD4: Tree and Landscape Character Planting**, now in **Policy G12: Biodiversity and Net Gain**).
- Objection to the requirement of 10% net gain in **Policy G12**, as not yet legal, instead suggesting alternative wording to refer to “ensure net gain” rather than having percentage.
- Support for **Policy G12** from the Environment Agency and Sussex Wildlife Trust, with some additional suggestions made by the Wildlife Trust to the Policy.
- Representations to **Policy G12**, 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 G13: Biodiversity Sites**.
- Concerns in relation to **Policy G13** 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 G13** 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 G14: Local Green Space** should mention non inappropriate development that can pass “the test”.
- Support from Sussex Wildlife Trust for **Policy G14** 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, Ardmere Ltd, Ifield Village Conservation Area Advisory Committee, Quod, Historic England, Environment Agency, 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, 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. Next Steps

### Additional Publication Consultation Stage (Regulation 19)

- 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'<sup>5</sup>. 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 Due to a number of key changes being made to the draft Local Plan since it was subject to the previous period of formal public consultation, it has been decided it is necessary for the council to reconsider the draft Plan, through a further Full Council, and publish the Draft Local Plan again for a further stage of Publication Consultation, before it is submitted for its independent examination.
- 4.3 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 previous 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.
- 4.4 Furthermore, the council has not directly responded to representations made during the Initial Publication Regulation 19 Consultation as part of this Consultation Statement document. Representations duly made previously during the consultation carried out between January and March 2020 will be retained and submitted to the Inspector in their entirety, unless new representations clearly state they supersede those made previously. Representations received during the Initial Publication Consultation are set out in Appendix 4.
- 4.5 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

- 4.6 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 2021 – 2037 (January 2021)
  - Sustainability Appraisal/Strategic Environment Assessment Draft Report
  - Habitat Regulations Assessment Draft Report
  - Draft Consultation Statement
  - Draft Infrastructure Plan
  - Along with any new or updated evidence documents.

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<sup>5</sup> i.e. Positively Prepared; Justified; Effective; and Consistent with National Policy (paragraph 35, National Planning Policy Framework, February 2019, MHCLG)

- 4.7 These will be available online on the council’s dedicated website:  
<https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-review>
- 4.8 Due to the COVID-19 restrictions, paper copies of the documents will not be available in the Town Hall or the Libraries.
- 4.9 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
- 4.10 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

- 4.11 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.
- 4.12 Responses to the issues raised will be provided and the outcomes of the consultation from both 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
Further Publication (Submission) consultation	6 January – 17 February 2021
Submission	March 2021
Examination in Public	May – September 2021
Adoption	March 2022