

Crawley Borough Council Response to Inspectors’ Initial Note, 20 September 2023 (ID-001)

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1. Outstanding Matters Summary Timetable

| Matter | Anticipated Deadline Date |
|--|---------------------------------------|
| Transport Modelling Assessment Sensitivity Testing | 15/8/23 Done |
| Response to the Initial Note | 26/9/23 This document |
| Assessment of Representations: CBC Officer Response to the Summary of Representations Received | 26/9/23 Accompanying this document |
| Consultation Statement Main Report, July 2023, Amended | 26/9/23 Accompanying this document |
| Other informal/ technical responses to April 2023 letter | 29/9/23 |
| Ongoing engagement with National Highways including a Circular 01/22 Checklist | 20/10/23 |
| Transport Modelling Assessment: Infrastructure Delivery Document | 27/10/23 |
| Strategic Flood Risk Assessment (update) | 10/11/23 |
| Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (update) | 10/11/23 |
| Water Neutrality Offsetting Implementation Scheme and update to Delivery Programme | Ongoing updates |

2. CBC Responses to Inspectors' Initial Note

| Matter | Inspectors' Comment/Request | CBC Response | Date |
|-------------------------------------|--|--|------|
| Submitted Plan | | | |
| | For the avoidance of doubt, we are treating the May 2023 document as 'the submitted plan' [CBLP/01]. | Noted and Agreed – this is the Local Plan approved by Crawley Borough Full Council on 22 February 2023 for Publication and Submission. | |
| | If any main modifications are considered necessary for soundness, they would be modifications to this Plan. | Noted. | |
| Schedule of Suggested Modifications | | | |
| | We note that the Council has submitted a schedule of suggested modifications, which it considers are minor changes for clarification and factual purposes [CBLP/07]. | Noted. | |
| Assessment of Representations | | | |
| | In assessing representations our focus has been on the 2023 representations submitted under the latest Regulation 19 exercise. | <p>The council has submitted all of the Representations received from each of the Regulation 19 Consultations. It was publicised at each stage that it would not be necessary for representors to resubmit comments which they would want to be retained. It was requested that representors withdrew in writing any representations they no longer maintained.</p> <p>On this basis, the council's Officer Response to the Summary of Representations Received is set out in separate tables against each formal stage of public consultation (Regulation 18: July – September 2019; Initial Regulation 19: January – March 2020; Additional Regulation 19: January – June 2021; Further Regulation 19: May – June 2023).</p> <p>It is hoped that it is clear from the council's responses to these where the representations have been</p> | |

| Matter | Inspectors' Comment/Request | CBC Response | Date |
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| | | resolved, where these are no longer relevant and/or where they remain outstanding. | |
| Assessment of Representations: CBC Officer Response to the Summary of Representations Received | We understand that the Council is providing its assessment against the latest set of representations received in June 2023. | <p>The council's Officer Response to the Summary of Representations Received is set out in separate tables against each formal stage of public consultation:</p> <ul style="list-style-type: none"> • Regulation 18: July – September 2019; • Initial Regulation 19: January – March 2020; • Additional Regulation 19: January – June 2021; • Further Regulation 19: May – June 2023. <p>Please note, the officer responses are to the summaries of the representation received and not the verbatim comments (as set out in the Consultation Statement Appendix 4, 6 and 8: Submission Documents References: KD/CS/01e; KD/CS/01h ; KD/CS/01j).</p> <p>Please note, the council's response to Regulation 18 consultation is already set out in the Consultation Statement Main Report, July 2023 (Submission Document Reference: KD/CS/01a).</p> <p>In addition, the summaries from the Regulation 19 Consultation are also already provided in the Consultation Statement Main Report. However, in considering the council's officer responses to these, some errors were identified. These have been corrected and an amended version of the July 2023 Consultation Statement Main Report is proposed to be published as an Examination Document, to replace the Submission Document, alongside the council's responses to the representations summary, for consistency.</p> <p>This does not change any of the Appendices.</p> | 26/9/23 |
| | It would assist us if that assessment were provided in the policy order of the submitted Plan. | Noted. | 26/9/23 |

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| | | The representation summaries and responses are set out in chapter and policy order of the Local Plan. | |
| | It would be helpful to us if the Council can advise through Charlotte when it is likely to submit its assessment / commentary against the May/June 2023 Reg 19 representations. | The council's Officer Response to the Summary of Representations Received has been submitted on 26/9/23. | 26/9/23 |
| Duty to Cooperate | | | |
| Other informal/ technical responses to April 2023 letter | Appendix J states that other informal / technical responses were received (including from Mid Sussex District Council and various prescribed bodies under the Duty). We have not been able to locate these other responses. If they have been published, we would be grateful to be directed to where we can find them. Alternatively, if they have not been provided it would assist the examination if they can be submitted as an examination document / bundle for completeness. | <p>These have not been published previously.</p> <p>These will be submitted by the end of the month.</p> <p>They are:</p> <ul style="list-style-type: none"> • Chichester District Council (email dated 28/4/23) • Chichester District Council (email dated 28/4/23) • Environment Agency (email dated 27/4/23) • Historic England (email dated 24/4/23) • Mid Sussex District Council (email dated 28/4/23) • National Highways (email dated 28/4/23) • Reigate and Banstead Borough Council (email dated 28/4/23) • South Downs National Park (email dated 14/4/23) • South Downs National Park (email dated 28/4/23) • Wealden District Council (email dated 28/4/23) • West Sussex County Council (28/4/23 – individual technical responses) • West Sussex County Council (email dated 28/4/23) | 29/9/23 |
| Additional Evidence | | | |
| Strategic Flood Risk Assessment (update) | We would welcome an update on progress on these aspects of the evidence base, which we | The council has received an initial draft of the updated SFRA from the consultants and will be responding with clarification comments and factual changes following | 10/11/23 |

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| | <p>understand will add to existing evidence already submitted.</p> <p>If there are known/intended dates for this work to be completed and submitted into the examination, it would be helpful if those timeframes could be shared with us.</p> <p>The Council's response on this matter will assist in when we timetable relevant hearing sessions, including how and when we give those with an interest in this updated evidence an opportunity to respond to it, in the interests of procedural fairness.</p> | <p>feedback from Horsham District Council by the 29/9/23.</p> <p>The draft will be shared by the consultants with West Sussex County Council (as the Lead Local Flood Authority) and the Environment Agency (EA). Following review, the final document will be submitted as an Examination Document via the Programme Officer, subject to the Inspectors' agreement.</p> | | | | |
| <p>Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (update)</p> | | <p>Survey letters have been sent out to residents on Traveller pitch sites within the borough. A deadline of 16 October has been offered for a response.</p> <p>The updated Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment will be finalised by 10 November and submitted as an Examination Document via the Programme Officer, subject to the Inspectors' agreement.</p> | <p>10/11/23</p> | | | |
| <p>Water Neutrality Offsetting Implementation Scheme and update to Delivery Programme</p> | | <p>An Update to the Water Neutrality Project, July 2023, was published and submitted alongside the Local Plan.</p> <table border="1" data-bbox="1133 882 1798 957"> <tr> <td data-bbox="1133 882 1317 917">DS/TP/00</td> <td data-bbox="1317 882 1677 954"> Water Neutrality Progress Update July 2023 </td> <td data-bbox="1677 882 1798 954">July 2023</td> </tr> </table> <p>Further updates and progress reports can be provided at appropriate times during the Local Plan Examination, as required.</p> | DS/TP/00 | Water Neutrality Progress Update July 2023 | July 2023 | <p>Ongoing Updates</p> |
| DS/TP/00 | Water Neutrality Progress Update July 2023 | July 2023 | | | | |
| <p>Transport Modelling Assessment Sensitivity Testing</p> | | <p>These have been published to the website, and submitted via the Programme Officer, as Submission Documents:</p> <table border="1" data-bbox="1133 1209 1798 1353"> <tr> <td data-bbox="1133 1209 1317 1244">ES/ST/01w</td> <td data-bbox="1317 1209 1677 1353"> Crawley Transport Modelling Study TN01 Comparison of Trip Ends in NTEM June 2023 </td> <td data-bbox="1677 1209 1798 1281">August 2023</td> </tr> </table> | ES/ST/01w | Crawley Transport Modelling Study TN01 Comparison of Trip Ends in NTEM June 2023 | August 2023 | <p>15/8/23 – Done</p> |
| ES/ST/01w | Crawley Transport Modelling Study TN01 Comparison of Trip Ends in NTEM June 2023 | August 2023 | | | | |

| Matter | Inspectors' Comment/Request | CBC Response | | Date |
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| | | | Crawley Transport Modelling Study TN02 GAL Sensitivity Test June 2023 | August 2023 |
| | | | Crawley Transport Modelling Study TN03 Gatwick Green Trip Generation Comparison June 2023 | August 2023 |
| Transport Modelling Assessment: Infrastructure Delivery Document | | The draft document has been prepared and is currently with West Sussex County Council (WSCC) for review. Following agreement by WSCC, the final document will be submitted as an Examination Document via the Programme Officer, subject to the Inspectors' agreement. | | 27/10/23 |
| Ongoing engagement with National Highways including a Circular 01/22 Checklist | | This is currently with National Highways who have confirmed they have had an initial look at it and will consider it further during the week commencing 2/10/23. Following agreement by National Highways, the final document will be submitted as an Examination Document via the Programme Officer, subject to the Inspectors' agreement. | | 20/10/23 |
| Gatwick DCO | | | | |
| | We are mindful that a concurrent application for a Development Consent Order (DCO) in respect of the north runway project at Gatwick Airport was accepted by the Planning Inspectorate in early August 2023. We will ensure that the timetabling of the Local Plan examination is sensitive to the fact that the Council and others will need to | Noted and Welcomed. | | |

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| | simultaneously engage staff resources into the DCO process. | | |
| | It is our current expectation to hold some hearings later this year and potentially for further hearings early in the new year. The timing of the latter will require careful coordination with the timing of any preliminary meeting(s) for the DCO examination. | Noted and Welcomed. | |
| Examination Website | | | |
| | We are pleased that the examination website is well-organised. | Noted. | |
| | Now the examination is under way, the examination webpages are the responsibility of the examination through us as the Inspectors. | Noted. | |
| | We will need to authorise any further updates or additions to the examination website to ensure that only material that we have sanctioned or requested is published. | Noted. | |
| | We will work closely and efficiently with Charlotte to approve updates to the website and look forward to the Council's assistance on this matter. | Noted and Welcomed. | |
| Topic Papers | | | |
| | We are pleased ... that the Council has provided various topic papers on key matters. | Noted. | |
| Programme Officer | | | |
| | We are pleased that the Council has engaged Charlotte Glancy (of Banks Solutions) as the Programme Officer for the examination, and we are constructively working with Charlotte to move the examination forward as expediently as possible. | Noted and Welcomed. | |

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| | We are encouraged by the constructive initial communication between the programme officer and yourselves. | Noted. | |
| | If you have any queries or seek clarification, please do not hesitate to contact us via Charlotte. | Noted. | |
| Deadline for Response | | | |
| Response to the Initial Note | We look forward to hearing from you in response to the points identified above as soon as possible and ideally by no later than the end of the month. | This document. Please let us know if anything need further clarification or explanation. | 26/9/23 |