Crawley Borough Council Schedule of Suggested Modifications to the

Submission Local Plan (May 2023)

May 2023 Local Plan page number	May 2023 Local Plan Policy/Para	Suggested Change	Reason
		Typos and Minor editorial corrections are not listed below: including updating paragraph numbers and page numbering in the contents page.	
1. Crawley's Local Plan			
7	Foreword	Deletion of second half of the final sentence in the last paragraph: This document is the draft new Local Plan which the council considers to be legally compliant and 'sound'~~, and is available for full final public consultation ahead of its submission to central government for its independent examination~~. ~~I encourage you to respond.~~	To reflect current stage of Local Plan and completion of Regulation 19 consultation.
9-10	1.4-1.7	Deletion of reference to Regulation 19 Consultation as current stage: ~~Current Stage of Consultation &~~ Local Plan Timetable ~~1.4 This six-week period of public consultation forms a third "Publication" stage of the preparation of Crawley's Local Plan. This forms the Local Plan the council considers to be its legally compliant and 'Sound' Plan for Submission to central government for its Independent Examination. The Submission Draft Local Plan sets the planning policies associated with the future development and potential growth of Crawley over the next 16 years.~~ ~~1.5 The consultation runs from **9 May 2023 until 5pm 20 June 2023**.~~ ~~1.6 Responses must be provided in writing and using the council's Response Form. This can either be in electronic format (via email to strategic.planning@crawley.gov.uk or by post to:~~ ~~Strategic Planning~~ ~~Crawley Borough Council~~	To reflect current stage of Local Plan and completion of Regulation 19 consultation.

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		~~Town Hall~~ ~~The Boulevard~~ ~~Crawley~~ ~~RH10 1UZ~~ ~~1.7 The council's response form, which must be completed to make formal representations to the Local Plan, will be available for completion, or download, through the council's website: www.crawley.gov.uk/localplan. Electronic copies are available to view at the Town Hall. You are invited to respond on the document as a whole, a specific topic area, a policy or a paragraph.~~	
10	1.9	Delete : ~~1.9 Following the close of consultation, all responses received will be collated and submitted to the Planning Inspectorate as part of the Submission of the Plan for its independent examination.~~	To reflect current stage of Local Plan and completion of Regulation 19 consultation.
10	New Paragraph 1.11	Insert New Paragraph: **A further stage of Publication (Submission) Consultation took place between May and June 2023. This followed a formal decision taken at Full Council in February 2022. In total, 67 individuals, business and organisations submitted formal representations to the Local Plan consultation.**	To reflect current stage of Local Plan and completion of Regulation 19 consultation.
18	Vision	Amend the Vision: *"…The borough will prepare for the increasing effects of climate change, through adaptation measures including lower water usage standards, including water neutrality where necessary, ~~and~~ delivering a net gain in biodiversity**, and supporting nature recovery**. Losses to protected and priority species and habitats will have been avoided and the delivery of vital ecosystem services…"*	For Clarification: recommendation from Natural England in Representations made to the Regulation 19 Consultation.

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2. Crawley Borough Local Plan			
30	Planning Policy Context	New paragraph 2.56: **West Sussex Waste Local Plan 2014 and Joint Minerals Local Plan 2018 (Partial Review 2021)** **2.56 The West Sussex Waste Local Plan covers the period to 2031 and is the most up-to- date statement of land use planning policy for waste. The West Sussex Joint Minerals Local Plan 2018 (partially reviewed 2021) covers the period to 2033 and provides guidance on how the safeguarding of minerals resources and infrastructure associated with minerals supply and waste management will take place in West Sussex (for example, wharves, railheads, processing plants). The documents provide the basis for making consistent decisions about planning applications for waste and mineral activities in West Sussex. As required by national policy and West Sussex County Council, the Local Plan Map displays the safeguarded railheads and Brick Clay Resource Consultation Area.**	For Clarification: recommendation from West Sussex County Council made to the Regulation 19 Consultation.
3. Sustainable Development			
4. Character, Landscape & Development Form			
5. Design & Development Requirements			
72	Policy DD4	Amend the Policy Reference to remove “Strategic”: ~~Strategic~~ Policy DD4: Tree Replacement Standards	For Consistency.
74	5.38	Amend paragraph:	For Clarification: recommendation from

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		Aerodrome safeguarding is the process used to ensure the safe and efficient operation of airports. It is in place to help protect aircraft and passengers during take-off**,** ~~and~~ landing and ~~while~~ **whilst manoeuvring on the ground and** flying in the vicinity of the airport. This in turn helps ensure the safeguarding of people living and working nearby.	Gatwick Airport Limited in Representations made to the Regulation 19 Consultation.
74	5.39	Amend paragraph: Aerodrome safeguarding differs to the principle of safeguarding land for a possible additional runway to the south of Gatwick Airport. Instead, it relates to how a development could impact on safety. Aerodrome safeguarding assesses, for example, the height and design of proposed developments or construction equipment that might be used (such as cranes) which could create a potential risk to the aerodrome through impacts on ~~radar~~ **CNS (Communication, Navigation & Surveillance) equipment and Instrument Flight Procedures (IFPs)** or building induced turbulence. It also considers the potential risk to aviation created by large landscaping schemes, lighting designs and new water bodies which could attract birds hazardous to aviation.	For Clarification: recommendation from Gatwick Airport Limited in Representations made to the Regulation 19 Consultation.
74	5.41	Amend paragraph: Gatwick Airport is ~~an EASA~~ **CAA (Civil Aviation Authority)** certified aerodrome. Therefore, the council is required to consult Gatwick Airport Limited on all planning applications where aerodrome safeguarding applies. The safeguarded area is neither the responsibility nor the proposal of the local planning authority.	For Clarification: recommendation from Gatwick Airport Limited in Representations made to the Regulation 19 Consultation.
74	5.42	Amend paragraph: Aerodrome safeguarding is a legal requirement by way of ICAO (International Civil Aviation Organisation) & ~~EASA (European Aviation Safety Agency)~~ **CAA** and is embedded in the Town & Country Planning process by way of ODPM/DfT circular 01/2003 'Safeguarding of aerodromes & military explosives storage areas' Direction 2002. Evidence suggests that, in general terms, the guidance in Planning Circular 01/2003 is not being applied consistently by local planning authorities, and that for clarity, local plans with an officially safeguarded aerodrome should include a policy.	For Clarification: recommendation from Gatwick Airport Limited in Representations made to the Regulation 19 Consultation.

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75	5.44	Amend paragraph: Statutory consultation responses may require that restrictions are placed on the height or detailed design of buildings, structures or other development to avoid impacts on the airport aerodrome, including those relating to ~~navigational aids~~ **CNS (Communication, Navigation & Surveillance) equipment and Instrument Flight Procedures (IFPs)** or on developments which may increase bird-strike risk, create building-induced turbulence or include lighting that could pose a hazard to the safe operation of the airport aerodrome.	For Clarification: recommendation from Gatwick Airport Limited in Representations made to the Regulation 19 Consultation.
75	5.47	Developers should refer to the Local List and also consult with ~~the~~ Gatwick Airport via gal.safeguarding@gatwickairport.com for advice on planning applications in the vicinity of the aerodrome. Developers should also refer for general awareness to the AOA (Airport Operators Association) technical aerodrome safeguarding advice notes available at www.aoa.org.uk/policy-campaigns/operations-safety/ **and CAST (Combined Aerodrome Safeguarding Team) at Combined Aerodrome Safeguarding Team/Civil Aviation Authority (caa.co.uk)**.	For Clarification: recommendation from Gatwick Airport Limited in Representations made to the Regulation 19 Consultation.
6. Heritage			
7. Open Space, Sport & Recreation			
8. Infrastructure Provision			
98	8.2	Amend date of Infrastructure Plan to reflect current version: “A complete picture of the provision of infrastructure in Crawley is contained in the Crawley Infrastructure Plan (~~May~~ **July** 2023)…”	Factual Update.

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99	8.8	Amend the paragraph: *It is important that the necessary infrastructure and community services are made available for the whole community, for everyone to enjoy a high quality of life. The NPPF highlights the role that the planning system can play in identifying and coordinating the provision of infrastructure74 and requires strategic policies to make sufficient provision for infrastructure75. The Infrastructure Plan sets out in more detail an assessment of infrastructure provision in Crawley**, and the additional infrastructure required in order to support the Local Plan strategy.** ~~These f~~ **F**acilities which make a contribution to the provision of infrastructure provision in the town will be protected unless alternative provisions are made. Where alternative provision is made this should be suitably located in terms of the functional requirements of the facility and the access requirements of the communities served, whether this be within or outside the boundary.*	For Clarity.
99	8.9	Amend the paragraph: *It is a fact that development will place additional demands on infrastructure provision and that developers will be expected to contribute to meeting the need for additional infrastructure generated by their development and ensuring cumulative effects are effectively mitigated. Development will be permitted where overall capacity limits, advised by infrastructure providers, are not breached. The council will charge developers the Community Infrastructure Levy (CIL) on appropriate development, in accordance with the council's adopted CIL Charging Schedule and the CIL Regulations (2010) as amended**, and CIL funds will be used to contribute towards meeting needs identified in the Infrastructure Plan.** *Developers will also be required to address relevant site-specific issues and direct impacts on infrastructure and, subject to the relevant tests set out in CIL Regulation 122, these will be addressed through Section 106 agreements requiring on-site delivery and/or a financial contribution towards off-site provision.* **The council will work proactively with infrastructure providers and developers to support the delivery of the improvements and facilities required to deliver the Local Plan strategy, and opportunities to secure additional funding will be maximised through proactive**	For Clarity.

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		engagement with government agencies, other public sector organisations, and private investors. *The Planning Obligations Annex sets out the charges and calculations anticipated from the planning policies in this Local Plan and these have been subject to viability testing as part of the whole Plan and CIL Viability assessment, to support the Local Plan. The council's adopted Supplementary Planning Documents provide additional guidance on the use of S106 agreements.*	
100	8.11	Add a footnote to the last bullet point in the paragraph: • *what loading/flow from the development is anticipated.*[1] [1]***Details on Thames Water's free pre planning service are available at:*** *https://www.thameswater.co.uk/developers/larger-scale-developments/planning-your-development/water-and-wastewater-capacity*	For Clarification: recommendation from Thames Water in Representations made to the Regulation 19 Consultation.
101	Policy IN2	Amend fourth paragraph in the Policy: Major facilities providing services on sites which are accessed by the whole town or wider area should be located in the most sustainable locations accessible by **public transport and/or active travel routes** ~~variety of means of transport~~.	For Clarification: recommendation from National Highways in Representations made to the Regulation 19 Consultation.
101	8.14	Amend the paragraph: "The Infrastructure Plan recognises that there is an estimated need for around ~~6-8~~ **4** additional forms of entry at secondary school level in Crawley during the course of the Plan…"	Factual Update advised by WSCC Education.
9. Economic Growth			
109	9.22	Delete final sentence of paragraph: …This higher labour supply figure factors in the possibility of increased housing delivery through urban extensions coming forward both west and east of Crawley. ~~It is anticipated that~~	For Clarification: recommendation from Horsham District Council in

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		~~although some employment needs arising from the proposed West of Ifield development would need to be met in Crawley, the development will itself provide around 2ha employment land, and remaining employment need arising from the development may be accommodated elsewhere within neighbouring districts.~~	Representations made to the Regulation 19 Consultation.
111-112	EC2	Amend the Policy: Crawley's Main Employment Areas make a significant contribution to the economy of the town and the wider area, and are a focus for sustainable economic growth. **Whilst identified as Main Employment Areas, Manor Royal, Gatwick Green, Gatwick Airport and Crawley Town Centre perform a specific employment role which is recognised in individual location-specific Policies EC3, EC4, TC1-TC5, and GAT4.** The **other** Main Employment Areas are: ~~• Manor Royal;~~ ~~• Crawley Town Centre;~~ ~~• Gatwick Airport;~~ ~~• Gatwick Green (allocation, Policy EC4 refers)~~ • Three Bridges Corridor (including Denvale Trade Park, Spindle Way, Stephenson Way and Hazelwick Avenue); • Maidenbower Business Park; • Tilgate Forest Business Centre; • Broadfield Business Park; • Lowfield Heath; • Broadfield Stadium and K2 Crawley; • The Hawth. Employment generating development will be supported in the **seven** Main Employment Areas **listed above** where it makes for an efficient use of land or buildings and contributes positively to sustainable economic growth and the overall economic function of Crawley. Development that would involve a net loss of employment land or floorspace in any Main Employment Area will only be permitted where it is demonstrated that:	For Clarity

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		i. the site is no longer suitable, nor viable, nor appropriate for employment purposes, or that a limited loss of employment floorspace will support the wider economic use of the site; and ii. the loss of any land or floorspace will result in wider social, environmental or economic benefit which clearly outweighs the loss; and iii. there would be no adverse impact on the economic function of the Main Employment Area, nor the wider economic function of Crawley.	
118	EC4	Additional bullet point added: **f. Submit a Construction Management and Phasing Plan, to include measures that consider and acceptably mitigate construction impacts on local and strategic road networks.**	For Clarification: recommendation from National Highways in Representations made to the Regulation 19 Consultation.
118	EC4	Amend bullet point p: p. Ensure the height and design of buildings, lighting and other design aspects are consistent with the operational standards of Gatwick Airport ~~and to~~ **with** respect **to** aerodrome safeguarding requirements **(Policy DD5 refers)**.	For Clarification: recommendation from Gatwick Airport Limited in Representations made to the Regulation 19 Consultation.
120	9.58	Amend paragraph: …Anticipated to be built out ~~over a seven to ten year period, completed by 2040~~ **by 2035**, the Gatwick Green allocation will meet Crawley's economic needs ~~in the latter part of~~ **during** the Plan period. A Masterplan will be required for the whole of the allocated land, to show how the areas to be built upon in the current, and potentially future, Plan periods, will be landscaped and will fit within the setting of the wider site.	For Clarification: recommendation from Gatwick Green Limited made to the Regulation 19 Consultation.
10. Gatwick Airport			
137	10.11	Add in additional wording into paragraph:	Factual update for clarification.

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		*However, passenger numbers are gradually returning to pre-Covid levels**, with 32.8million passengers using the airport in 2022.** It is anticipated they will continue to grow…….”*	
137	GAT1	Amend criterion iii second sentence: iii. Where this is not possible, suitable safeguards are in place to ensure impacts can be adequately mitigated or, as a last resort~~, like for like~~ **fair** compensation is secured.	For Clarification: recommendation from Natural England in Representations made to the Regulation 19 Consultation.
138	10.14	Amend existing wording: *~~Submission of the DCO is currently anticipated in early summer 2023 with,~~ **The DCO application was submitted in early July 2023 and,** should it be approved, operational use ~~starting~~ **is anticipated to start** in 2029”*	Factual update.
139	GAT2	Amend Policy: Proposed new wording: GAT2: Add policy wording as in adopted Local Plan “***Where appropriate, planning permission may be granted on a temporary basis***”.	
140	10.19	*10.19 For the purpose of policy interpretation small-scale development includes development such as residential extensions, updating or refurbishment of buildings, some changes of use, or other minor development. **Appropriate temporary uses may include those that are short term, with a defined end date and which don’t involve significant construction.** Incompatible development within safeguarded land is regarded as development which would add constraints or increase the costs or complexity of the development or operation of an additional runway. The airport operator will be consulted on all applications within the safeguarded area for a second runway.”*	
11. Crawley Town Centre			

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12. Housing Delivery			
13. Meeting Housing Needs			
180	13.6	Amend existing wording: The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (~~2013~~ **2023**) identified a need to find a reserve site suitable for accommodating ten Gypsy and Traveller pitches to meet potential accommodation needs arising from the existing community currently living within Crawley over the whole Plan period.	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment
180	13.7	Amend existing wording: The assessment ~~identified approximately 30 Gypsy, Traveller and Travelling Showpeople households living within Crawley; with 77~~ **confirmed that 103** individuals identifi**ied**~~ying~~ themselves as a 'White Gypsy or Irish Traveller' within the **2021** ~~2011~~ Census. **In addition, 337 individuals identified themselves as 'White Roma'. The Census 2021 data suggests that 13 households within Crawley reside within a caravan or other mobile or temporary structure accommodation type. This includes six Gypsy and Traveller households residing on three private sites in caravan accommodation, and three Travelling Showpeople households sharing a single site within the borough.**	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment
180	13.8	Amend existing wording: The **surveys carried out in 2023 as part of the Assessment, highlighted** ~~completed questionnaires identified a demand for pitches, particularly through~~: ~~• the aspiration for Gypsy and Traveller children to live on a pitch;~~ ~~• desire to move out of their current bricks and mortar accommodation owing to preference; and~~	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment

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		• ~~the anticipation of new family formations expected to arise from the existing households within Crawley.~~ • **A preference to stay on small privately-owned, family-sized sites, suitable for multi-generational occupation on individual pitches.** • **A strong preference to remain in caravan accommodation and maintain a travelling lifestyle.** • **A desire to retain stability for the younger generation to attend school and college.** • **A desire to remain in Crawley.** • **Impacts on health from uncertainty, instability and negative reactions towards them.** • **No additional households required new pitch sites.**	
180	13.9	Amend existing wording: It **was concluded, in the original Accommodation Needs Assessment undertaken in 2013/14,** ~~is considered~~ that none of the participants in bricks and mortar accommodation demonstrated an immediate 'need' in terms of having a proven psychological aversion to bricks and mortar accommodation. **It was not possible to revisit Traveller families within bricks and mortar for the 2023 Accommodation Needs Assessment update. However, the evidence suggests that the demand for sites from the existing population was over-estimated in the 2014 Assessment. Instead, the need has arisen from Traveller families moving into the borough from outside the county, from publicly run sites to take up private family-sized sites. Therefore, from the data review and surveys carried out there is no conclusive evidence which suggests there is an immediate need for a new publicly owned pitch site within the borough.** However, **when taking potential future growth from the Traveller families within Crawley and in light of the location of the private sites within the borough being located on land safeguarded for potential future airport runway expansion to the south, and affected by airport noise, there is considered to be** ~~a growth rate of 3% has been applied to the number of households~~	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment

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		~~currently living within Crawley for the purposes of estimating the potential future need which may arise from the current population over the Plan period (beyond the first five years). This resulted in~~ a Local Plan need for a reserve site suitable for accommodating up to ten Gypsy and Traveller pitches. ~~This Accommodation Needs Assessment was reviewed in 2020 with the same conclusion being reached, and the same findings are emerging from the current 2023 review.~~	
180	13.10	Delete paragraph: ~~None of the surveyed Gypsy and Travellers indicated that they owned land which they wished to be considered for a Gypsy and Traveller site.~~	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment
180	13.11	Amend existing wording: The borough is heavily constrained by its administrative boundaries, which in most parts of the borough do not extend significantly beyond the Built-Up Area. The presence of Gatwick Airport also renders a significant amount of land in the north of the borough unsuitable for residential development (particularly Gypsy and Traveller accommodation) due to noise constraints; and other areas of land are constrained by flood risk. These factors limit the opportunities for providing a suitable site for permanent caravan accommodation but a location for a ~~possible~~ reserve site has been identified.	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment
191	13.52	Amend existing wording of Policy H8 Reasoned Justification: *Crawley is a constrained urban environment and is in a position where difficult prioritisation of new development is required as the last undeveloped or underdeveloped sites are allocated for future uses. This situation results in high land values and limited opportunities for Gypsies, Travellers and Travelling Showpeople to bring forward site provision themselves. There are currently three ~~authorised~~ Gypsy and Traveller sites in Crawley, for six pitches in total, and one authorised site for Travelling Showpeople with three plots. The existing Gypsy, Traveller and Travelling Showpeople sites are all located within the land to*	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment

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		*the north of the borough. ~~Two of the authorised~~ **New or renewed** Gypsy and Traveller sites **in this location would be** ~~are~~ subject to temporary permissions, as this area is acknowledged to be unsuitable for permanent caravan accommodation, particularly due to the potential future southern runway expansion proposals for Gatwick Airport. In addition, there is a more substantial local population living within bricks and mortar accommodation.*	
191	13.53	Amend existing wording of Policy H8 Reasoned Justification: *The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (~~2020, and the emerging~~ 2023 ~~draft Assessment~~) for Crawley indicates a potential future need of up to ten pitches for Gypsies and Travellers arising from the existing population within Crawley. This includes the families currently accommodated on the existing temporary permitted pitch sites. Furthermore, whilst the **original** survey work completed for those in bricks and mortar accommodation did not identify any immediate need for additional sites, **and no need arising from these families has been evident over the 10 year period since that was carried out,** it is inherently improbable that within the next 15 year period there will be no new households formed requiring additional site provision.*	Factual Update to reflect final Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment
14. Green Infrastructure & Biodiversity			
195	Vision: Environmental Sustainability Statement	Amend the Vision: *"…The borough will prepare for the increasing effects of climate change, through adaptation measures including lower water usage standards, including water neutrality where necessary, ~~and~~ delivering a net gain in biodiversity**, and supporting nature recovery**. Losses to protected and priority species and habitats will have been avoided and the delivery of vital ecosystem services…"*	For Clarification: recommendation from Natural England in Representations made to the Regulation 19 Consultation.
198	14.12	Insert into paragraph: *The NPPF requires local authorities to plan for strategic development considering the impacts on existing infrastructure and the need for new infrastructure to service that development and also to contribute to and enhance the natural and local environment. **Natural England have produced a Green Infrastructure Framework. The framework***	For Clarification: recommendation from Natural England

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		has developed 15 Green Infrastructure principles. The framework sets out each principle, a description of the principle, what the principle is seeking to achieve, how to produce good Green Infrastructure and the relation to government policy and guidance. *The Local Plan evidence base, …"*	in Representations made to the Regulation 19 Consultation.
199	14.14	*Natural England's Accessible ~~Natural~~ Green Space Standards[133] recommend that all people should have accessible natural green space:* • *Of at least two hectares in size, no more than 300m (five minutes' walk) from home.* • *At least one accessible 20-hectare site within 2km of home* • *One accessible 100-hectare site within 5km of home.* • *One accessible 500-hectare site within 10km of home.* • *A minimum of one hectare of statutory local nature reserves per 1,000 people* • *That no person should live more than 500m from at least one area of accessible woodland of no less than 2ha in size.* • *That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.* • *That there should also be at least one area of accessible woodland of no less than 20ha within 4km (8km round trip) of people's homes.* Amend Reasoned Justification paragraph and Table: *The table below sets out Natural England's* ***updated*** *Accessible Greenspace Standards and the Woodland Trust's Access Standard. Ideally, both sets of standards should be met for all new development to be located within the distance criteria for each size of accessible natural greenspace and woodlands. However, it is recognised that in an urban area such as Crawley, where there is a lack of available land for large new provision, a pragmatic approach is necessary. The table below also sets out the local standards for natural greenspace established by Crawley's Open Space, Sport and Recreation Assessment (2020).*	Factual Update: recommendation from Natural England in Representations made to the Regulation 19 Consultation.

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204	GI3	Amend the Policy: "Development whose primary objective is to conserve or enhance biodiversity will be supported. All development proposals will be expected to incorporate features to encourage biodiversity and enhance existing features of nature conservation value within and around the development. Development proposals will be required to demonstrate how the scheme will meet the government's requirement for securing measurable 'net gains' in biodiversity, including information calculating the current biodiversity value of the site. **Biodiversity Net Gain is in addition to existing habitats and species protections. In delivering Biodiversity Net Gain for development proposals, the mitigation hierarchy should be followed.** As a minimum, all development proposals will need to achieve a net gain for biodiversity in accordance with government expectations[136], currently a 10% increase in habitat value for wildlife compared with the pre-development baseline. This should be calculated using the government's most recently published Biodiversity Metric and be supported by relevant specialist ecological surveys, interpretation and advice. The pre-development baseline will be taken from January 2020. All developments, even with a pre-development baseline of Zero or low baseline will be expected to provide net gain. Developments that are of a smaller size should look to use **the Small Sites Biodiversity metric.** **Developments on sites with low (or zero) existing biodiversity baseline should use the** Urban Greening Factor criteria to achieve appropriate improvements and gains to the environment. In the first instance 'net gain~~s~~' **units** should be sought on-site. If on-site is not feasible then **delivery of** off-site 'net gains' **units should be identified as part of a strategic solution. Where neither of these options can be identified, net gains** should be sought in the form of 'Biodiversity Credits' **that can contribute to a strategic solution**. Gains should be sought for perpetuity for the lifetime of the development. Any credits that are bought to	For Clarification and Factual Updates: recommendation from Natural England and Sussex Wildlife Trust in Representations made to the Regulation 19 Consultation.

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		deliver off-site Net Gains should demonstrate that they will be secured for at least 30 years via conditions or agreements. **Appropriate management and maintenance measures should be in place throughout and following development.** Applicants will also be required to submit their baseline findings and proposals to the Sussex Biodiversity Record Centre in an appropriate format. …"	
15. Sustainable Design & Construction			
220	15.37	Insert new paragraph: **The Environment Agency defines a water stressed area as a location where 'the current household demand for water is a high proportion of the current effective rainfall which is available to meet that demand or where the future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand'. The Thames River Basin District Management Plan 2022 identifies the ecological status of the River Mole catchment at Crawley as ranging 'moderate' to 'bad', with 'changes to natural flow and levels of water' identified as a key challenge. Among its management recommendations, as also identified in the Gatwick sub-region Water Cycle Study 2020, is for Local Plans to support tighter levels of water efficiency for residential and non-domestic use. This will support the achieving of 'good' status under the Water Environment (Water Framework Directive) (England and Wales) Regulations.** Add footnote: **Thames River Basin District Management Plan 2022** Thames river basin district river basin management plan: updated 2022 - GOV.UK (www.gov.uk)	For Clarification: recommendation from Environment Agency in Representations made to the Regulation 19 Consultation.
220	15.38	Amend paragraph: ~~The Environment Agency defines a water stressed area as a location where 'the current household demand for water is a high proportion of the current effective rainfall which is~~	For Clarification:

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		~~available to meet that demand or where the future household demand for water is likely to be a high proportion of the effective rainfall available to meet that demand'.~~ Crawley Borough Council is one of many local authorities to have declared a climate emergency. Climate change is predicted to increase pressure on water resources, increasing the potential for a supply-demand deficit in the future, and making environmental damage from over abstraction of water resources more likely. The delivery of water and wastewater services and the heating of water in the home require high energy inputs, and water efficiency can reduce energy use and carbon emissions. It is equally important that development does not cause an unsustainable increase in water abstraction.	Avoids repetition following introduction of new paragraph 15.37
220	15.39	Amend date on footnote 160: Letter to Local Planning Authorities, *Water Efficiency in New Homes*, 1 September ~~2021~~**2022**, DEFRA	To correct an error
220-21	15.40	Amend paragraph: …The Policy requires that, where located outside of Sussex North WRZ, non-residential development must equal or exceed BREEAM Excellent requirements, which require that there is a 25% reduction in potable water use. ~~Further information on water efficiency is provided in the Planning and Climate Change SPD.~~	For Clarification: Avoids repetition following introduction of new paragraph 15.41
221	15.41	Insert new paragraph within the Reasoned Justification for Policy SDC3: **Measures that maximise the water efficiency of development are encouraged, and should development be designed to a more ambitious water efficiency standard than outlined in Policy SDC3, this will be supported. Further guidance is provided in the Waterwise UK Water Efficiency Strategy to 2030 and the Planning and Climate Change SPD.** Add footnote: **Waterwise UK Water Efficiency Strategy to 2030** J37880-Waterwise_Water_Efficiency_Strategy_Inners_Landscape_WEB.pdf	For Clarification: recommendation from Natural England in Representations made to the Regulation 19 Consultation.

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221	15.42	Amend paragraph: Sussex North WRZ is supplied from ground water abstraction**, from the Folkestone beds of the Lower Greensand/Wealden Greensand semi-confined aquifer,** on the River Arun, close to Pulborough in Horsham District…"	For Clarification: recommendation from Natural England in Representations made to the Regulation 19 Consultation.
222	15.43	Amend paragraph: "To provide the necessary certainty, **the most feasible approach is for** development **to** demonstrate that it is water neutral."	For Clarification: recommendation from Natural England in Representations made to the Regulation 19 Consultation.
222	15.45	Amend paragraph: "…(OIS) being prepared; **Note that achieving the aforementioned higher levels of efficiency will enable the OIS to provide necessary offsetting more effectively, thereby reducing offsetting costs and ensuring viability for all development within the WRZ.** Development may choose…"	For Clarification: recommendation from Natural England in Representations made to the Regulation 19 Consultation.
222	15.45	Insert new sentence at the end of the paragraph: "…Development may choose to achieve water neutrality through other means, but the key principles of water efficient design and offsetting the additional demand created remain. **Offsetting is expected to be provided prior to occupation of new developments and this shall be enforced by conditions.**"	For Clarification: to address concerns raised by Sussex Wildlife Trust and CPRE Sussex in Representations made to the Regulation 19 Consultation.

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222	15.45	Further amendment of proposed new sentence at end of paragraph: "**Offsetting is expected to be provided prior to occupation of new developments and this shall be** ~~enforced by conditions~~ **secured through the Development Management process.**"	For Clarity.
222	15.45	Amend reference to 'Local Planning Authority led' in Paragraph 15.45 and Policy SDC4 bullet points 2 and 3 to refer to '**Local Authority and South Downs National Park Authority led**'. This is because there is a distinction between the role of the Local Authorities and the South Downs National Park Authority (which will lead on SNOWS), and the Local Planning Authorities.	For Clarity.
222	Policy SDC4	Insert the word "Strategic" ahead of Policy in the Policy title: **Strategic** Policy SDC4: Water Neutrality	For Consistency.
223	Policy SDC4	Amend policy criteria 2: "2. A local ~~planning~~ authority **and South Downs National Park Authority (SDNPA)-**led water offsetting scheme will be introduced to bring forward development **and infrastructure** supported by Local and Neighbourhood Plans. The authorities will manage access to the offsetting scheme to ensure that sufficient water capacity exists to accommodate planned growth within the Plan period."	For Clarity.
223	Policy SDC4	Amend policy criteria 3 and split into two criteria: "3. Development proposals are not required to utilise the local ~~planning~~ authority **and SDNPA**-led offsetting scheme and may bring forward their own offsetting schemes. **Any such development proposals will need to have regard to the local authority and SDNPA-led offsetting scheme and associated documents.** **4.** Offsetting schemes can be located within any part of the WRZ, with the exception that offsetting will not be accepted within the Bramber/Upper Beeding area in Horsham district."	For Clarity.
223	Policy SDC4	Amend policy criteria 4 (and renumber to criteria 5 to take account of additional criteria above): "~~4.~~ **5.** Where an alternative water supply is to be provided, the statement will need to demonstrate that no water is utilised from sources that supply the Sussex North WRZ. The	For Clarification: recommendation from Natural England in Representations made

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		wider acceptability of **and certainty of delivery for** alternative water supplies will be considered on a case-by-case basis."	to the Regulation 19 Consultation.
223	Policy SDC4	For Policy SDC4, we suggest as a modification ***moving Section 5 (Water Neutrality Statement) up to Section 2*****.** This is to make the policy structure more logical. It is based on the recognition that all applications within Sussex North Water Resource Zone are required to submit a Water Neutrality Statement, and this represents a first port of call. It then follows that an applicant would logically consider the subsequent sections relating to Offsetting Schemes or Alternative Water Supply.	For Clarity
224	15.49 – new paragraph 15.50	Insert a paragraph after 15.49: "*Applicants using the* ***Local Authority and SDNPA-led*** *Offsetting Implementation Scheme (OIS) to offset water, will 'buy in' to the scheme at a level to ensure that their development achieves water neutrality. Where development achieves its offsetting through accessing the OIS, a proportionate developer contribution will be secured. Further detail on this contribution is set out in the Planning Obligations Annex. Recognising that the capacity of water offsetting that the OIS can provide may be limited at particular points in time during the plan period, the authorities will monitor use across the WZ and manage access to the OIS to ensure that, prior to permissions being granted, sufficient water capacity exists to ensure that water neutrality will be achieved when occupation takes place.* **15.50** ***Offsetting capacity in the OIS is not limitless and access will be managed by the local authorities to ensure there is sufficient capacity in the OIS to demonstrate water neutrality in schemes that are approved. The authorities will publish and keep regularly updated, a Scheme Access Prioritisation Protocol (SAPP) to show how access to the offsetting in the OIS will be managed. Infrastructure necessary to support planned growth, such as schools, will be prioritised in the SAPP.***	For clarity to support reference in Policy SDC4 criteria 2 in relation to "The authorities will manage access to the offsetting scheme to ensure that sufficient water capacity exists to accommodate planned growth within the plan period".
224	15.51	Split Paragraph 15.51 (re-numbered to 15.52 due to the new 15.50 paragraph proposed above) and add additional text as follows to create new paragraphs 15.53 and 15.54: **15.52** (was 15.51) For all development, it will be necessary to demonstrate how water	Provides necessary clarity for developers on how 'certainty' will need

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		neutrality will be achieved through a Water Neutrality Statement to be submitted as part of any planning application within the Sussex North WRZ. This will be required to set out baseline information relating to existing water use within a development site, full calculations relating to expected water use within a proposed development; and full details of how any remaining water use will be offset. Detail should also be provided as to how delivery of water efficiency measures, alternative water supplies and offsetting prior to occupation of the development will be verified and monitored. **15.53** Should applicants not utilise the Local Authority OIS, **certainty of delivery of alternative offsetting will need to be demonstrated. T**he Water Neutrality Statement should supply full details of the offsetting scheme that their development would rely upon. **Similarly, certainty of alternative supply will need to be demonstrated in the Water Neutrality Statement. For connection to an alternative water company, this could be achieved by confirming that the alternative water company has sufficient capacity and will take on supply to the development. For a private supply borehole or other source of supply, this will require evidence that sufficient water supply is available to meet demand arising from the proposed development, and demonstrating with certainty that the alternative supply source does not impact upon the Arun Valley sites.** **15.54 To provide the necessary certainty, measures to deliver water neutrality will need to be secured through the Development Management process.** The council will seek to provide additional guidance to further assist applicants with water neutrality statements.	to be demonstrated through a Water Neutrality Statement and how certainty will be secured. This reflects the modification proposed at 8.1.4.6 of CBC response to Matter 8, reference: document CBC/MIQ/008b Matter 8: Character, Design and Heritage, November 2023.
16. Environmental Protection			
228	16.15	Add additional wording as a last sentence to the third bullet point in this paragraph where it relates to Flood Zone 3b as follows: **The 2023 SFRA applies a precautionary approach, as agreed with the Environment Agency, using the 2% AEP output to derive Flood Zone 3b.**	Factual Update to respond to updated Strategic Flood Risk

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			Assessment, November 2023.
237	EP6	Amend policy as follows: Development must demonstrate how it will minimise light pollution ~~so as~~ to avoid significant harm to biodiversity **and public and highway safety,** and prevent unacceptable sky glow, glare, light spillage and unnecessary energy usage.	For Clarification: recommendation from National Highways in Representations made to the Regulation 19 Consultation.
17. Sustainable Transport			
241	17.8	Amend the Paragraph: *In order to promote sustainable development, the Policy further supports the national planning policy objectives of identifying and pursuing opportunities to promote walking, cycling and public transport use; providing for high-quality walking and cycling networks; and ensuring that the design and access arrangements of new developments give priority first to pedestrian and cycling movements. National policy objectives are further outlined ~~in~~ **by the Department for Transport in Circular 01/2022: Strategic road network and the delivery of sustainable development, and in** ~~Department for Transport's:~~ Gear Change: a vision for cycling and walking, which expects "sustainable transport issues to be considered from the earliest stages of plan-making and development proposals, so that opportunities to promote cycling and walking are pursued"166. Planning policies are to provide for high quality cycling and walking networks, green spaces and green routes, and supporting facilities such as cycle parking (drawing on Local Cycling and Walking Infrastructure Plans). The design requirements to achieve this are set out in Policy CL3.*	For Clarification: to address National Highways in Representations made to the Regulation 19 Consultation.
Appendix A: Sustainability Objectives			

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Appendix B: Supporting Guidance Documents			
250		Update reference to: ~~**West Sussex Joint Minerals Local Plan** WSCC and SDNP, 2018~~ with **West Sussex Joint Minerals Local Plan, 2018 (Partial Review 2021)**	Factual Update
251		Insert the following document: LEED 2009 for New Construction and Major Renovations Rating Systems U.S. Green Building Council, 2009 **Letter to Local Planning Authorities, *Water Efficiency in New Homes*, 1 September 2022, DEFRA** EU Water Framework Directive	To reflect footnote 160
251		Update reference to: **Water Stressed Areas – Final Classification** Environment Agency, ~~2013~~**2021**	Factual Update
252		Insert the following document: West Sussex Energy Study AECOM Limited, 2013 **Department for Transport Circular 01/2022: Strategic road network and the delivery of sustainable development, DfT, 2022** The Road to Zero: Next Steps towards cleaner road transport and delivering our Industrial Strategy, 2018	For Clarification: to address National Highways in Representations made to the Regulation 19 Consultation.
Background Studies and Evidence Base Documents			
256		Update reference to: **Water Stressed Areas – Final Classification** Environment Agency, ~~2013~~**2021**	Factual Update
256		Add to Environmental Sustainability: **Thames River Basin District Management Plan 2022**	
256		Add to Environmental Sustainability: **Waterwise UK Water Efficiency Strategy to 2030**	

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Planning Obligations Annex			
Parking Standards Annex			
Noise Annex			
Housing Trajectory			
Employment Land Trajectory			
Local Plan Map			
	Local Plan Map	Addition to Local Plan Map: Add Brick Clay Resource Consultation Area (including buffer zone) – as per West Sussex Joint Minerals Local Plan, 2018 (Partial Review 2021)	For Clarification: recommendation from West Sussex County Council made to the Regulation 19 Consultation.

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		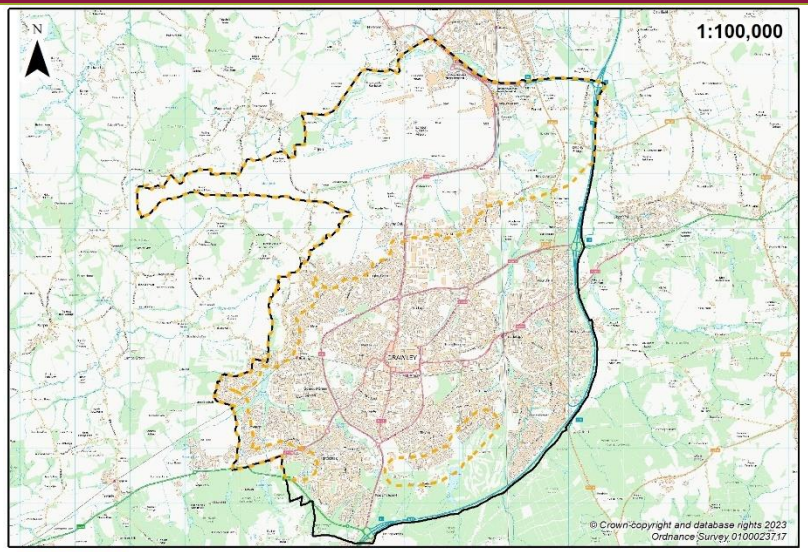 Brick Clay Resource Consultation Area (WSCC Minerals Local Plan 2021) Corresponding amendment adding Brick Clay Resource Consultation Area to Local Plan Map Legend. Brick Clay Resource Consultation Area (WSCC Minerals Local Plan 2021)	
	Local Plan Map	Removal from Local Plan Map: Remove the safeguarded railhead buffer zone, which does not need to be shown on the Local Plan map. The buffer zone is included in the Mineral Consultation Area (MCA) for consultation purposes only. The safeguarded railhead is retained and continues to be displayed on the Local Plan Map.	For Clarification: recommendation from West Sussex County Council made to the Regulation 19 Consultation.

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		 Corresponding amendment removing reference in Local Plan Legend to buffer zone. Safeguarded Railheads ~~and Buffer~~ (WSCC Minerals Local Plan 2021)	
	Local Plan Map	Linear Contained Views (Policy CL7): Amendment to address issue of this layer being partially obscured by Structural Landscaping layer on Local Plan Map. Long Distance Viewpoint (Policy CL7): Local Plan Map erroneously omitted the Long Distance Viewpoint symbology, which should have been shown as part of the Long Distance View Splays. These have been added with corresponding addition to the Local Plan Map Legend.	For Clarification: To address mapping clarity issue. For Clarification: To address mapping omission.

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		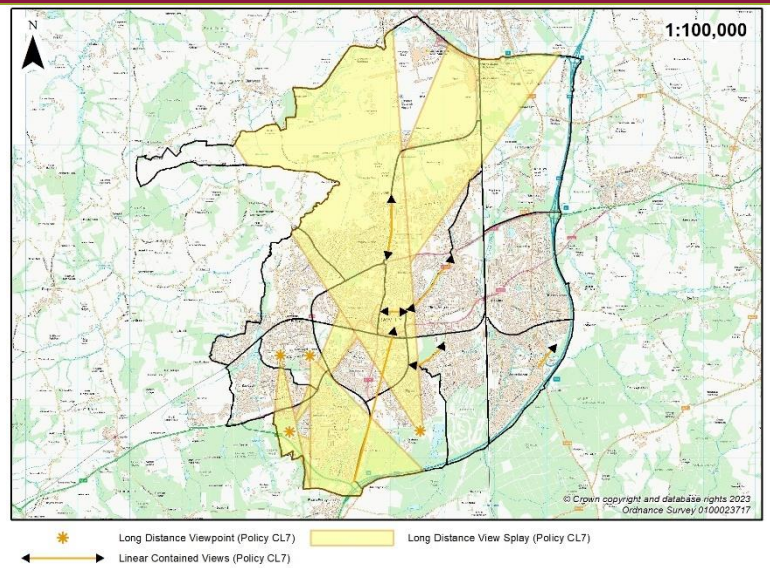 Arrow heads amended to black to enhance clarity. Corresponding amendment made to Local Plan Map Legend. Long Distance Viewpoint (Policy CL7) Long Distance View Splay (Policy CL7) Linear Contained Views (Policy CL7)	