Consultation Statement

February 2024

Crawley Borough Local Plan
Modifications Consultation

Crawley Borough Council

This document has been prepared in accordance with:

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

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1. Introduction

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

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

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

Crawley Borough Local Plan Review

1.4 The council commenced its review on the current Local Plan in 2018. Four formal stages of public consultations have been undertaken between:

- July and September 2019 (Early Engagement);
- January and March 2020 (Initial Publication Consultation);
- January and June 2021 (an extended Additional Publication Consultation); and
- May and June 2023 (a Further Publication Consultation).

Table 1: Local Plan Review Consultations Carried Out

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

1.5 Publication Consultation (in accordance with Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012) is the 'final' stage of consultation undertaken on what the council considers to be its "Sound" Local Plan for the purposes of submission to the Secretary of State for independent examination.

[1] Local Development Scheme 2023 – 2025 (January 2023) CBC: https://crawley.gov.uk/planning/planning-policy/engagement-and-monitoring/local-development-scheme
[2] Town and Country Planning (Local Planning) (England) Regulations 2012: http://www.legislation.gov.uk/uksi/2012/767/contents/made
[3] Crawley Borough Council Statement of Community Involvement: A guide to participating in the planning system (June 2020) CBC: SCI June 2020

1.6 The further stage of Publication Consultation carried out for the Local Plan between May and June 2023 reflected key changes to the Local Plan due to the delays and new policy requirements created by the need to secure water neutrality for developments within the Plan period[4].

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

2. Early Consultation Stage (Regulation 18)

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

Table 2: Involve Stage of Consultation Extract from Statement of Community Involvement

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

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

Early Engagement Consultation's Aims

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

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

Who we consulted

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

Table 3: Pre-Formal Consultation Consultees and Key Stakeholders

Crawley Borough Council Officers	External Partners & Key Stakeholders
Environmental Health Economic Regeneration Development Management Sustainability Community Development Amenity Services Property Waste Services Drainage Housing Crawley Homes Deputy Chief Executive	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

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

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

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

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

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

How the consultation was conducted

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

2.10 The council published the following Consultation Draft Documents for scrutiny and comment:

- Crawley 2035: Draft Consultation Crawley Local Plan 2020 – 2035 (July 2019)
- Sustainability Appraisal/Strategic Environment Assessment Scoping and Draft Report
- Habitat Regulations Assessment Screening Report
- Draft Consultation Statement
- Draft Infrastructure Plan.

[5] 15 July until 16 September 2019

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

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

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

2.14 A staffed 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 raise 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 would 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 be kept 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 Staffed exhibitions were successful in providing those who were informed about the Local Plan the opportunity to discuss more detailed aspects of the Local 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:

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

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

Town Hall

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

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

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

Crawley Library

2.28 Two exhibitions were held in Crawley Library:

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

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

September: 30 people spoke to officers and one additional person observed and took leaflets. This included local residents and representatives from residents and 'friends of' groups who received the Planning News alert and updates from the Community Development team reminders using social media. Matters which were discussed included Crawley's growth and population, Gatwick Airport, green spaces and infrastructure capacity.

K2 Crawley

2.30 One exhibition was held at K2 which extended into the evening:

1. Monday 5 August (3pm – 8pm).

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

Developer Forum

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

Community Forum

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

Summary of Representations Received

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

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

a. Local Plan

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

Table 4: Early Engagement (Regulation 18) Main Issues and CBC Response 2019

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

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

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

Main Issues	How this was taken into account?
• Requests for indoor sports facilities including skating rinks and bowling alleys and disabled sports facilities.	Amendments made to the public rights of way policy in accordance with the technical and specialist advice.
Infrastructure Provision: *Comments were received from 36 individuals and organisations/businesses on the Infrastructure Provision Chapter. These included comments from 10 individuals at the events and 11 responses to the set survey questions. In addition, detailed comments were received from 16 organisations and businesses, including from Thames Water, National Grid, West Sussex County Council, Southern Water, Surrey County Council, Department for Education, Gatwick Airport Limited, The Woodland Trust, Environment Agency, The Ifield Society, Town Access Group, NHS Property Services and one agent on behalf of developer/landowner.* *Specific comments were received on page 83, paragraph 8.3, 8.9, 8.15-8.22 and on every policy in this Chapter (IN1, IN2 and IN3) as well as general observations on provision of Infrastructure within Crawley.*	
• Concerns raised around designations impacting on future development potential and landowner concerns. • Health and education issues raised by local residents and the infrastructure providers/agencies. • Support for infrastructure policies, regarding maintenance and where they are located outside of Crawley (but serve Crawley). • Information provided regarding specific infrastructure services and networks (including water, waste water, energy, education, highways, fire and rescue, and health). • Request for financial contributions to be sought from development to support education and health needs. • Detailed wording suggested for the communications infrastructure policy.	Detailed amendments made to the chapter and policies to address comments and suggestions received. Cross-reference now made to the new Planning Obligations Annex to accompany the Plan, which collates all known and anticipated developer contributions associated with the Local Plan policies. Inclusion of reference to securing contributions towards education and health has been included in the policy. Amendments made to the communications policy in accordance with the technical and specialist advice.
Economic Growth: *Comments were received from 33 individuals and organisations/businesses on the Economic Growth Chapter. These included comments from three individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 21 organisations and businesses, including from Mole Valley District Council, Sport England, Manor Royal BID, West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, Reigate and Banstead Borough Council, Horsham District Council, the Ifield Society, and 10 agents on behalf of developer/landowners and one business.* *Specific comments were received on Policies EC1, EC2, EC3, EC4, EC5, EC6, EC7, EC8, EC9, EC10 and EC12 as well as general observations on Economic Growth of Crawley.*	
• Comments in relation to the constrained land supply and developer promotion of sites and safeguarding and car parking from agents on behalf of landowners of sites within this area. • Concern regarding interpretation of the office policy – with a few businesses and agents believing it to be prioritising office development over other business development such as industrial. • Support and concerns raised in relation to the Visitor and Night-Time economy policies – including in relation to hotels in Manor Royal and at the Airport.	This chapter has been amended to reflect the updated evidence from the Economic Growth Assessment. Amendments have been made to reflect the intention to undertake an Area Action Plan on the "area of search" land, which will include consideration of meeting the economic needs arising from the borough. The Skills Policy has been amended and greater detail regarding the planning obligations expectations from developers

Main Issues	How this was taken into account?
	has been included in the Planning Obligations Annex.
Gatwick Airport: *Comments were received from 39 individuals and organisations/businesses on the Gatwick Airport Chapter. These included comments from nine individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 20 organisations and businesses, including from Mole Valley, Manor Royal BID, West Sussex County Council, Thames Water, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group, Horsham District Council and six agents on behalf of developer/landowners and one business.* *Specific comments were received on paragraphs 10.1-10.9, 10.11-10.15, 10.17-10.25, 10.27-10.30, and on every policy in this Chapter (Policies GAT1, GAT2, GAT3 and GAT4) as well as general observations on Gatwick Airport.*	
• Support for retaining safeguarding and support for removing safeguarding from the public. Gatwick Airport Limited support retaining safeguarding and landowner submissions requiring the removal of safeguarding for other economic development. • Position from Gatwick Airport Limited supporting amending the Airport boundary and, objections from landowners and others suggesting it to be retain as current (should safeguarding be retained). • Support for all on-airport parking, and support for allowing off-airport parking from the public. Representations from off-airport parking provider supporting off-airport parking. Support for retaining on-airport parking approach from Gatwick Airport Limited.	The draft Local Plan proposes to remove safeguarding and replace a wider area "the Area of Search" with the commitment to produce an Area Action Plan. This Development Plan Document will be commenced at the point of the Local Plan's adoption. It will consider the appropriate land uses within the area and set detailed policies for the proper planning and development of the area. This will include the need for runway expansion and airport growth (subject to robust evidence of need); economic development, housing development and the Crawley Western Link Road alignment. It will also include consideration of the land needed to maintain the gap between Crawley and the Airport. The draft Local Plan maintains the on-airport car parking approach. The draft Local Plan maintains the Airport boundary to that relating to the council's own records.
Crawley Town Centre: *Comments were received from 26 individuals and organisations/businesses on the Crawley Town Centre Chapter. These included comments from eight individuals at the events and 12 responses to the set survey questions. In addition, detailed comments were received from five organisations and businesses, including from Sussex Wildlife Trust, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner.* *Specific comments were received on Policies TC2, TC3 and TC5 as well as general observations on Crawley Town Centre.*	
• Limited responses overall in relation to the Town Centre. • Strong support for Crawley Town Centre facilities and accessibility. • Desire for greater offer and particular shops.	Amendments have been made to the Town Centre chapter reflect the updated emerging evidence position. Detailed amendments have been made to the Key Opportunities Sites policy for the purposes of clarity.

Main Issues	How this was taken into account?
• Support the need for neighbourhood facilities policy, but concern the policy should not be used for residential developments to provide the facilities required. • Highlighting the need for town centre impact testing to include other town centres beyond Crawley town centre from RBBC (i.e. Redhill).	Confirmation has been included to the need for impact testing for other centres beyond Crawley Town Centre.
Housing: *Comments were received from 80 individuals and organisations/businesses on the Housing Chapter. These included comments from 32 individuals at the events, six residents via email/letter, 11 responses to the set survey questions and a response from the local MP. In addition, detailed comments were received from 30 organisations and businesses, including from Thames Water, Mole Valley District Council, Southern Water, Home Builders Federation, West Sussex County Council, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Rusper Parish Council, Sussex Wildlife Trust, CPRE Sussex, National Custom and Self-Build Association, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group, Mid Sussex District Council, Horsham District Council and nine agents on behalf of developer/landowners, one business, one agent on behalf of the Crawley Goods Yard and Natural England (received late due to technical issue).* *Specific comments were received on paragraphs 12.17 and 12.34 and Policies H1, H2, H3b, H3c, H3d, H3e, H3g, H4, H5, H6, H7 and H8 as well as general observations on Housing and the Housing Trajectory.*	
• Comments made by other authorities regarding their inabilities in meeting Crawley's unmet needs supporting maximising the amount to which Crawley meets its own needs within its boundaries and pressing the Local Plan to ensure no stone is unturned (including support for the increased densities policy). • Some concerns from neighbouring authorities raised over the remit and wording of the draft urban extensions policy. • Concern against 'over development' of Crawley, and support for urban extensions instead of building within Crawley where this is to meet Crawley's affordable housing needs, from some local residents. • Support for 'going up' instead of 'out'. Concern regarding particular promoted urban extension to the west of Crawley by Homes England, from some local residents. • Opposition to building housing on open spaces. • Concern the housing mix being provided is restricted to small units, not meeting needs of families, and perception of too many flats and not enough houses (even small houses with gardens). • New site at St. Catherine's Hospice promoted for housing or care home. • Support from landowners/developers of existing sites for the continued inclusion of their site in the Plan. Suggestions from some landowners that the anticipated yield should be reconsidered and increased. • Comments received on detailed policies for Build to Rent and Custom and Self-Build Housing. • Concern regarding the continued allocation for the reserve Gypsy and Traveller site at Broadfield Kennels from two local residents and the local MP, as well as an	Amendments have been made to the housing chapter reflect the updated evidence position. This includes changing the affordable housing tenure split to 75/25 rental/intermediate (from the existing 70/30 split). Amendments to the Key Housing Sites policy to reflect the factual build-out of sites and allocate three new sites (one new town centre key opportunity site; one housing and open space site; and one housing for older people site; and the deallocation of one site due to conflicts with the noise policy). Some changes have been made to better clarify the purpose of the urban extensions policy.

Main Issues	How this was taken into account?
objection to the existing housing allocation at Breezehurst Drive Playing Fields from one local resident.	
Green Infrastructure & Biodiversity: *Comments were received from 22 individuals and organisations/businesses on the Green Infrastructure & Biodiversity Chapter. These included comments from four individuals at events and eight responses to the set survey questions. In addition, detailed comments were received from 10 organisations and businesses, including from West Sussex County Council, the British Horse Society, Sussex Ornithological Society, The Woodland Trust, Sussex Wildlife Trust, Environment Agency, the Ifield Society, one agent on behalf of developer/landowner and Natural England (received late due to technical issue).* *Specific comments were received on paragraph 13.17 and on every policy in this Chapter (Policies GI1, GI2, GI3 and GI4) as well as general observations on Green Infrastructure and Biodiversity.*	
• Concerns raised around designations impacting on future development potential and landowner concerns. • Support for the Green Infrastructure and Biodiversity policies. • Suggested detailed wording for the Green Infrastructure policy and the Biodiversity policies. • Support for Biodiversity Net Gain – recommendations to strengthen the requirement, and concern regarding ensuring this is considered properly as part of the viability assessment. • Some suggested additional sites for consideration against the Local Green Space criteria, including: Tilgate Park, Worth Park, Grattons Park, Milton Mount, The Hawth, West Green Park and Ifield Millpond (currently the designation only applies to Ifield Brook Meadows and Playing Fields). • Concern from the landowner that the Local Green Space designation goes further than national policy.	Detailed amendments made to the chapter and policies to address comments and suggestions received.
Sustainable Design & Construction: *Comments were received from 19 individuals and organisations/businesses on the Sustainable Design & Construction Chapter. These included comments from two individuals at events, one resident via email and eight responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from Southern Water, Home Builders Federation, Manor Royal BID, CPRE Sussex, Environment Agency, two agents on behalf of developer/landowners and Natural England (received late due to technical issue).* *Specific comments were received on every policy in this Chapter (Policies SDC1, SDC2 and SDC3) as well as general observations on sustainable design and construction.*	
• Support for the need to encourage sustainable energy provision. • Support for the tightening of water usage requirements. • Objections to requiring higher than national requirements.	Detailed amendments made to the chapter and policies to address comments and technical suggestions received.
Environmental Protection: *Comments were received from 19 individuals and organisations/businesses on the Environmental Protection Chapter. These included comments from one individual at events and eight responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including*	

Main Issues	How this was taken into account?
from West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, CPRE Sussex, Environment Agency, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner. *Specific comments were received on paragraph 15.18 and Policies EP1, EP2, EP3 and EP4 as well as general observations on Environmental Protection.*	
• Support for the flooding policies. • Concerns regarding air quality – particularly in relation to air and road transport, as well as from Pease Pottage compost facility. • Concern regarding noise pollution – particularly in relation to air and road transport, including from landowners affected and from GAL, who particularly drew attention to two of the housing allocations in the Plan (Steers Lane and Heathy Farm, both Forge Wood Residual Sites).	Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current national and local environmental health advice.
Sustainable Transport: *Comments were received from 48 individuals and organisations/businesses on the Sustainable Transport Chapter. These included comments from 20 individuals at events and 10 responses to the set survey questions. In addition, detailed comments were received from 18 organisations and businesses, including from Metrobus, Network Rail, Surrey County Council, Home Builders Federation, Manor Royal BID, West Sussex County Council, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group and five agents on behalf of developer/landowners.* *Specific comments were received on paragraphs 16.1, 16.14 and on every policy in this Chapter (Policies ST1, ST2, ST3 and ST4).*	
• Support for sustainable transport – strong support for the bus network and Fastway and improvements strongly supported. • Need to improve the cycle network and pedestrian access in the town. • Concern about existing road and junction capacity. • Support and objections to the principle of a Crawley Western Relief Road (tied to whether there was support or objection to potential urban extensions to the west of Crawley), and some detailed concerns regarding the alignment from landowners affected and Gatwick Airport Limited.	Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current highways advice and local and corporate sustainability approach. Parking Standards have been updated to incorporate the most up-to-date West Sussex evidence and these have been developed into a new Parking Standards Annex for the Local Plan. Reference in the Plan to the "Relief" road has been amended to the "Link" road, as this is felt better reflects the purpose of the road. The plan of "area of search for the Crawley Western Link Road" has been amended to show the correct area to the A23 north of County Oak.

b. Sustainability Appraisal/Strategic Environmental Assessment

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

subsequently received in July 2020. These concurred with the findings of the SA scoping report and SA draft report.

c. Infrastructure Plan

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

d. Habitat Regulations Assessment

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

3. Initial Publication Consultation Stage (Regulation 19)

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

Table 5: Consult Stage of Consultation Extract from Statement of Community Involvement

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

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

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

Publication Consultation's Aims

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

How the consultation was conducted

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

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

Key Documents

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

Supporting Technical Evidence Base

- Housing Trajectory (December 2019)
- Strategic Housing Land Availability Assessment (January 2020)
- Strategic Housing Market Assessment (November 2019)
- Northern West Sussex Economic Growth Assessment (January 2020)

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

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

3.8 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

3.9 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).

3.10 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.

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

Summary of Representations Received

3.12 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

3.13 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)

3.14 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.

Table 6: Initial Publication (Regulation 19) Consultation Summary of Main Issues 2020

Local Plan General & Vision
General comments on the Local Plan and its vision were received from four representors. These included neighbouring local authorities, national government agencies, developers and specific interest groups: Reigate and Banstead Borough Council, Environment Agency, Quod and Sussex Wildlife Trust. *Comments were received on the strategic approach to housing, economy and the environment.* • Request from Reigate and Banstead Borough Council to amend references to Housing Market Areas and overlaps between them in relation to **paragraph 2.26**. • The Environment Agency question whether the issue of stress on sewage infrastructure is being included in the Local Plan or not. • The Sussex Wildlife Trust support the Vision and suggest further additional amendments.
Sustainable Development
Comments on this Chapter were received from 25 representors. These included those from neighbouring local authorities, national government agencies, landowners and planning agents, businesses and specific interest groups: Highways England, St. Catherine's Hospice, Historic England, Environment Agency, Rainier Developments Ltd, Sport England, West Sussex County Council, Sussex Wildlife Trust, LRM Planning Limited, Legal & General, Sport England, Horsham District Council, Ardmore Ltd, UK Commercial Property Finance Holdings Ltd, Wilky Group, Natural England, HX Properties Ltd, Montagu Evans on behalf of Homes England, Tandridge District Council, Quod, Reigate and Banstead Borough Council, Mole Valley District Council, Mid Sussex District Council, Gatwick Airport Ltd and LRM Planning Limited. *Comments were received in relation to Policies SD1, SD2 and SD3.* • The strategic objectives in **Policy SD1: Presumption in Favour of Sustainable Development** were criticised by The Hospice due to repetition elsewhere in the Plan, whilst the heritage objective was supported by Historic England, and the Environment Agency wanted an additional objective about water resources added. • Highways England flagged the importance of Transport Assessments, both for the Local Plan and individual sites. • Respondents, including WSCC Public Health team and Sport England support **Policy SD2: Enabling Healthy Lifestyles and Wellbeing,** with some minor wording changes suggested by some. • GAL, and Legal and General, owners of an extensive landholding in Mole Valley, objected to the removal of safeguarding citing the Aviation 2050 consultation document which states it is "prudent to continue to safeguard". GAL argues **Policy SD3: North Crawley Area Action Plan** is contrary to existing and emerging aviation and national planning policy which requires the continuation of safeguarding, and that the land is not required to meet employment needs which can be satisfied elsewhere in the borough, including within the airport and in neighbouring districts. • Landowners with sites within the Area Action Plan (AAP) area supported the removal of safeguarding, and the designation of the AAP area through **Policy SD3**. Representors

cited the Government support of expansion at Heathrow to argue that there is no national policy need for continued safeguarding at Gatwick.

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

Character, Landscape & Development Form

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

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

- Support for the retention of **Policy CL1: Neighbourhood Principle**, as its origin comes from the original new town spatial strategy and is a distinguishing characteristic of the town.
- Suggested change to **Policy CL1** so it states that higher density will be encouraged where it is situated in sustainable locations (as opposed to stating higher density 'may be compatible').
- Support for the combination under one chapter of character, the design of new development and landscape character.
- Support for **Policies CL2 – CL5** which require the form of new development to reflects the defining characteristics of each neighbourhood.
- Representation that **Policy CL2**: **Making Successful Places: Principles of Good Urban Design** makes no reference to the National Design Guide.
- Suggestion that **Policy CL2** should set out the minimum density ranges.
- Respondents encouraged to see their amendments have been incorporated.

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

Design & Development Requirements

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

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

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

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

Crawley Town Centre

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

Comments were received on Policies TC2, TC3 and TC5.

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

Housing Delivery

Comments on this Chapter were received from 30 representors. These included six local residents, neighbouring local authorities, national government departments and agencies,

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

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

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

Meeting Housing Needs

Comments on this Chapter were received from nine representors. These included neighbouring local authorities, landowners, developers and planning agents, businesses and specific interest groups: Gladmans Development Ltd, Catherine's Hospice, Rainier

Developments Ltd, Bellway Homes Ltd, Persimmon Homes Ltd, Home Builders' Federation, Tetlow King Planning, Rentplus UK Ltd, Gatwick Airport Ltd and Reigate and Banstead Borough Council.

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

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

Green Infrastructure & Biodiversity

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

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

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

Sustainable Design & Construction

Comments on this Chapter were received from five representors. These included national government departments and agencies, utilities providers, landowners, developers and

planning agents: Rainier Developments Ltd, Surrey County Council, Ardmore Ltd, Environment Agency, Southern Water and Natural England.

Comments were received on Policies SDC1, SDC2 and SDC3.

- **Policy SDC1: Sustainable Design & Construction** should be more flexible and avoid adding additional burdens to development.
- Support for stricter water efficiency requirements in **Policy SDC3: Tackling Water Stress**.

Environmental Protection

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

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

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

Sustainable Transport

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

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

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

Planning Obligations Annex

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

- Specific comments/advice on approach to particular inputs for assessment of viability.
- Concern raised that Paragraph 2 in **Policy OS2: Provision of Open Space and Recreational Facilities** needs to be in accordance with paragraph 97 of NPPF.

- Highlighted the need to test cumulative impact of new policies, e.g. the effect of 10% net gain on development.

Noise Annex

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

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

Housing Trajectory & Strategic Housing Land Availability Assessment

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

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

- Queries regarding the treatment of specific sites in relation to windfall allowance within Housing Trajectory.
- Representations on future development potential of Crawley Hospital.

Employment Land Trajectory

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

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

Duty to Cooperate

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

- Home Builders Federation and Gladman Developments questioned whether any Statements of Common Ground had been prepared and agreed as part of the Local Plan Review.
- Local Authorities provided responses in relation to on-going joint working and unmet development needs and confirmed they did not consider they had any capacity to meet those needs within their administrative areas.
- A local resident raised concerns in relation to strategic development outside the borough's administrative boundaries.

Sustainability Appraisal/Strategic Environmental Assessment

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

- Need for clearer measures to enhance biodiversity.
- Disagreement with/ objection to particular assessments/weightings, including on policies GAT2, EC3, EC4, EC6 and H1.
- Questioning of why there is no test of higher threshold for affordable housing (Policy H5).
- SEA representations re Gatwick Green.
- Holiday Extras raise various points in relation to the consistency between the 2015 SA/SEA and the current SA/SEA. In particular that off-airport parking for objectives 1 and 2 is assessed as a 'double negative' when it was previously a single negative. The same argument is made in relation to the impact of off-airport parking on biodiversity.
- Question on why higher densities are not encouraged instead of building urban extensions that effect biodiversity.

- Highlight the need to ensure there is a sufficient evidence base upon which to plan to deliver net gain in biodiversity.
- Natural England agree with the findings of the SA and SEA.
- Wilky support conclusions of SA/SEA with regard to the AAP policy but consider that the negative impact cited for "Conserve /enhance Biodiversity and Landscape" should instead be neutral or positive because of the requirement for bio-diversity net gain and mitigation/compensation.

Local Plan Map

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

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

Infrastructure Plan

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

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

Habitats Regulations Assessment

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

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

4. Additional Publication Stage (Regulation 19)

4.1 A number of key changes were made to the draft Local Plan following the initial period of formal Publication public consultation carried out between January and March 2020. This was particularly due to advice relating to the government's aviation policy, which required the council to reinstate most of the land safeguarded for an additional runway to the south of Gatwick Airport.

4.2 These changes were reconsidered in a comprehensive updated draft Local Plan at Full Council on 16 December 2020 and a formal decision was made which agreed the amended draft Plan for publication and submission to the Secretary of State for its independent examination.

Publication Consultation's Aims

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

How the consultation was conducted

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

Extension of Consultation Duration and Communications

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

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

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

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

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

Coronavirus Pandemic

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

Consultation Materials

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

Key Documents

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

Supporting Technical Evidence Base

- Topic Paper 1: Unmet Needs and Duty to Cooperate (January 2021)
- Topic Paper 2: Gatwick Airport (January 2021)
- Topic Paper 3: Housing Needs (January 2021)
- Topic Paper 4: Housing Supply (January 2021)
- Topic Paper 5: Employment Needs and Land Supply (January 2021)
- Topic Paper 6: Climate Change (January 2021)
- Topic Paper 7: Development and Noise Technical Appendix (January 2021)
- Housing Trajectory (1 September 2020)
- Strategic Housing Land Availability Assessment (January 2021)
- Strategic Housing Market Assessment (November 2019)
- Crawley Windfall Statement (January 2021)
- Northern West Sussex Economic Growth Assessment (January 2020)
- Economic Growth Assessment – focused update for Crawley (September 2020)
- Employment Land Availability Assessment (January 2021)
- Employment Land Trajectory (January 2021)
- Retail, Commercial Leisure and Town Centre Needs Assessment (January 2020)

- Eco-Serv-GIS Report (January 2020)
- Strategic Flood Risk Assessment (September 2020)
- Site Allocations and Flood Risk Background Paper (October 2020)
- Open Space, Sport and Recreation Assessment (December 2020)
- Indoor Sports Facilities Assessment (January 2021)
- Playing Pitch Assessment (January 2021)
- Playing Pitch Strategy Stage C Needs Assessment (March 2021)
- Playing Pitch Strategy Stage D Strategy and Action Plan (March 2021)
- Draft Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment (January 2021)
- Draft Densification Study Part 1 (January 2021)
- Safely Landed? Lichfields Report (July 2018)
- Gatwick Sub-Region Water Cycle Study (August 2020)
- Crawley Heritage Assets Review (January 2021)
- Water Cycle Study Crawley Addendum (January 2021)
- Crawley Borough Council – Climate Emergency Support (June 2020)
- Air Quality and Emissions Mitigation Guidance for Sussex (January 2020)
- Land-Use Planning and Development Control: Planning for Air Quality (January 2017)
- Planning Noise Advice Document Sussex (2021)
- Local Plan and Community Infrastructure Levy Viability Assessment (March 2021)
- Crawley Transport Study (May 2021)

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

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

1. Legally Compliant;
2. Sound.

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

Who we consulted

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

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

Summary of Representations Received

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

- draft Local Plan;
- Local Plan Map;
- Sustainability Appraisal/Strategic Environmental Assessment;

- Habitat Regulations Screening Report;
- Infrastructure Plan

4.16 Representors included:

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

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

Table 7: Additional Publication (Regulation 19) Consultation Summary of Main Issues 2021

Local Plan General & Vision
General comments on the Local Plan and its vision were received from 13 representors. These included local residents, local authorities, national government agencies, developers and specific interest groups: Crawley Town Centre Bid Board, Highways England, Turley on behalf of A2 Dominion, Squires Planning, Barton Wilmore on behalf of The Sogno Family, West Sussex County Council, Gladman Developments, Rusper Council, SMB Town Planning Limited, and LRM Planning on behalf of WT Lamb Properties, Staminier Group and Elliot Metals/The Simmonds Family. *Comments were received on the strategic approach to housing, economy and the environment.* • WSCC commented that the transport evidence base required (at the time) further work and offered its assistance to address the soundness of the Plan. • General comments on housing, town centre, and supporting infrastructure. • General concerns were raised that some evidence base, including viability and transport work, had not been completed at the time of Regulation 19 consultation. • Concern expressed relating to the proposed allocation of a strategic employment location at Gatwick Green. • Support for the **Local Plan Vision**, particularly in relation to economic growth. • Some representation questioned the legal compliance of the Local Plan.

Sustainable Development

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

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

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

Character, Landscape & Development Form

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

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

- Representations were received supporting the neighbourhood principle in **Policy CL1: Neighbourhood Principle**.
- Suggestions were received to secure higher density close to transport corridors.
- Representations were received from land promoters highlighting how their scheme addresses the criteria set out in **Policy CL2: Principles of Good Urban Design**.
- Support was received for the higher densities set out in **Policy CL4: Compact Development** and the maximisation of housing delivery within the borough.
- Support was received for the higher densities close to sustainable transport hubs in **Policy CL4**, but concern was raised that the walking distance was too short and flexibility of application was requested.
- Representations were received suggesting **Policy CL4** should only allow developments below the minimum density of 45dpa in exceptional circumstances and be supported by evidence.
- Objections were received from a planning agent on behalf of a developer to **Policy CL4**.
- Greater evidence in the form of the Densification Study was requested to confirm CBC has done all it can to meet as much of its housing need within the borough as possible.
- Suggestion from the landowner to remove the designation of **Policy CL6: Structural Landscaping** to some areas – this was a repeated representation from the previous Regulation 19 consultation carried out in 2020.
- Representation was received requesting Structural Landscaping be included on the Local Plan Map.
- Representations were received from the planning agents on behalf of land promoters in relation to their proposed schemes and **Policy CL7: Important and Valued Views**.
- Representations were received suggesting amendments to the Built Up Area Boundary and promoting land outside the Built Up Area Boundary, as an extension to Manor Royal

for employment use from planning agents on behalf of land promoters (**Policy CL8: Development Outside the Built-Up Area Boundary**).
- Support was received for the West of Ifield Rural Fringe sensitive countryside character area in **Policy CL8**.
- Concern was raised in relation to the conflict between the acknowledgment of the role of the Upper Mole Farmlands Rural Fringe in **Policy CL8** and the proposed Area of Search for the Crawley Western Link Road (Policy ST4).
- Objections were received from the landowners to their site's partial location outside the Built-Up Area Boundary.
- Support was received from Natural England to **Policy CL9: High Weald Area of Outstanding Natural Beauty**.

Design & Development Requirements

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

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

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

Heritage

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

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

- Support received for the various designations included – particularly within Ifield – as well as the Local Green space designation.
- Request that Village Greens be added to list of Heritage Assets **Policy HA1: Heritage Assets** and that reference is made in the policies to Ifield Village Green.

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

Open Space, Sport & Recreation

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

Comments were received on Policies OS2 and OS3.

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

Infrastructure Provision

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

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

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

Economic Growth

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

Comments were received on Chapter 9 generally as well as specific Policies EC1, EC2, EC3, EC4, EC5, EC7, EC8, EC9, EC10 and EC11.

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

- Support was received for the approach set out in **Policy EC1**, noting that the focus of new land allocations is to provide industrial units at Gatwick Green, with mixed business growth at Manor Royal and at existing employment sites. Horsham District Council considered this complementary to its employment strategy which supports smaller business spaces and start-ups.
- The approach of **Policy EC2: Economic Growth in Main Employment Areas** was supported.
- Concern was expressed that part of a site appeared to be removed from the Manor Royal Main Employment Area – this latter point relates to a mapping error that has since been addressed.
- It was suggested that the **Policy EC2** loss of employment criteria should not apply to town centre locations.
- Representations were received which did not consider **Policy EC2** to be sufficiently supportive of retail foodstores.
- Support was received to the amendment to **Policy EC7: Hotel and Visitor Accommodation** which recognises the airport, like the Town Centre, as a sustainable location for hotels and excludes it from the sequential test.
- Conversely, objections were also received to this change to Policy EC7, arguing it is against national policy and that the primary objective should be the vitality and viability of the town centre.
- Representations also argued that airport-related parking is appropriate at Town Centre hotels.
- Support was received for **Policies EC8 to EC11 inclusive** from Crawley Town Centre BID.

Gatwick Airport

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

Comments were received on Policies GAT1, GAT2 and GAT3.

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

- Sussex Wildlife Trust and the Woodland Trust are concerned about biodiversity assets, including ancient woodland in the safeguarded area.
- Support was received from GAL to **Policy GAT3: Gatwick Airport Related Parking**.
- Objections were received to **Policy GAT3**, primarily on the grounds of GAL's permitted development rights and role in the provision of airport parking, and the restriction of competition.
- Concern was raised by the Woodland Trust that on airport car parking is inappropriate within ancient woodlands.
- GAL support **Policy GAT4: Employment Uses at Gatwick**.

Crawley Town Centre

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

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

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

Housing Delivery

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

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

Housing Need (**Policy H1**)

- Objections/concerns were received regarding **Policies H1: Housing Provision and H2: Key Housing Sites**, suggesting that housing needs should be met within Crawley by building at higher densities rather than outside the borough boundary in areas of biodiversity value, which would be the effect of the strategy set out in Policies H1 (Housing Provision) and H2 (Key Housing Sites).
- Recommendations received from older people housing developer in relation to the Local Plan, including the inclusion of bespoke policy/policies setting specific delivery targets, development requirements and allocations in respect of housing for older people, with delivery to be monitored through the AMR.
- Support is received to the 'positive approach to meeting housing need in the Borough' which is reflected in the emerging plan, noting that unmet housing need remains an issue affecting the wider sub-region.

- Concerns raised that the plan must be 'mindful of the cumulative impacts of policy on the viability and deliverability of residential development in the borough'.
- Horsham District Council request that clearer evidence is provided to justify the proposed housing requirement (and resulting level of unmet need) by showing how proposed levels of development (e.g. for the sites in Policy TC3) have been arrived at, including through the completion of the Densification Study. HDC welcomes the increase to the windfall allowance from 55 to 90 dwellings per annum on the basis of evidence set out in the Windfall Statement.
- Objections received to the approach taken in **Policy H1** as 'unsound' as the evidence provided is insufficient to justify a 'supply-led' housing requirement which does not fully meet the borough's identified housing needs. The connection of housing to health and wellbeing as promoted by draft Policy SD2 is highlighted.
- Representations received suggest that in the absence of a clear plan for meeting unmet needs the Plan is unsound and non-compliant with the Duty to Cooperate.
- Concern is raised that the Plan is overly reliant on already-identified sources of housing supply with insufficient work undertaken to identify new sources or establish whether sources already identified can provide increased supply.
- Concerns and objections are received regarding consideration of alternative housing requirement figures within the SA, the proposal in Policy H1 to adopt a 'stepped' housing requirement, the deliverability of the identified 5-year housing land supply.
- Resident representation considers that Crawley's housing need figure needs to be updated to reflect the most recently published inputs which form part of the standard method, reducing the annual figure from 750 dwellings to 718.
- Resident representation suggests amendments to the proposed five year housing land supply buffer in order to reduce the unmet need passed on to neighbouring authorities in the early part of the Local Plan period.
- Waverley Borough Council note the scale of unmet housing need arising from Crawley and welcomes the acknowledgement that discussions regarding the meeting of this unmet need will be focused on the Northern West Sussex Housing Market Area (HMA). States that Crawley's unmet need should be met within the same HMA and that Waverley Borough is unlikely to be able to take any additional need, being already required to accommodate some unmet need from Woking.
- Agreement is received confirming the council's need figure to be in accordance with the Government's standard method, subject to further updates in line with new affordability ratios. However, representations suggest that a need figure in excess of that resulting from the Standard Method is likely to be appropriate, given the intention of Gatwick Airport to bring the northern runway into regular use, subject to a DCO application. On this basis, it is suggested that the need figure should be revised accordingly before the level of housing delivery within the borough is established.
- The significant unmet need for housing identified in **Policy H1** and the absence of an agreed strategy for meeting this need across the wider Housing Market Area (HMA) is noted. Representations consider that CBC should be undertaking further work to find sites for residential development within the borough before progressing with the submission of the plan.
- Support for the publication of a Statement of Common Ground (SOCG) between CBC, Horsham District Council, Mid Sussex District Council and West Sussex County Council in 2020, identifying the predicted amount of unmet need arising from Crawley, but concern is raised that there is no strategy for distributing that need across the local authority areas within the Northern West Sussex Housing Market Area.

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

- Concern is raised regarding the removal of Policy H3g (Urban Extensions) from earlier draft and request received that para. 2.33 is amended to include wording giving stronger protection to the High Weald AONB and setting out requirements for Habitat Assessments in other urban extension locations.

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

Site Allocations (**Policy H2**)

- Support is received from the landowner for the allocation of **Land adjacent to Desmond Anderson, Tilgate**.
- Support is received from the planning agent on behalf of the landowner for the allocation of **St Catherine's Hospice** current site on Malthouse Road, Southgate. However, concern is expressed that the proposed allocation for older people and those with disabilities is overly prescriptive, and that the policy should allow for more flexibility for potential development of the site for general needs housing. In addition, the representation suggests that the site can accommodate a higher density of development than envisaged in draft **Policy H2**. Detailed comments in relation to the design of the site were also provided.
- Support was received from the planning agent on behalf of a landowner to the allocation of **Land East of Street Hill** the site to deliver 15 dwellings and endorses the SHLAA assessment of the site as being suitable, available and achievable. However, the representations objects to criterion (v): 'avoid harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS)'.
- Objections were received to the proposed allocation of **Land East of Street Hill** as Housing, Biodiversity and Heritage site, on the basis of the sensitivity of the area in ecological and heritage terms, and the relatively limited contribution which it would make to meeting Crawley's housing need.
- Resident representation objects to allocation of **Land East of Street Hill** on biodiversity, amenity, landscape and heritage grounds.
- Homes England, as landowner, proposes that a higher figure of 138 dwellings can be accommodated at **Tinsley Lane Playing Fields**, and also requests flexibility regarding requirements in respect of allotment provision.
- Resident representation expresses concern that the projected dwelling yield for the **Town Centre Broad Location** is expressed as a minimum, whereas this is not so with most other sites/Broad Locations. Concern is raised that this creates a risk that the Town Centre is treated as an 'overfill' area where any amount of residential development is acceptable.

- Support is received for the allocation of **Land SE of Heathy Farm**, with representation recommendations that this allocation be worded flexibly (in respect of dwelling yield and open space requirements) to allow indicative the dwelling quantum to be exceeded where feasible. Changes are recommended to the ratings detailed against the site in the Sustainability Appraisal.
- Woodland Trust object to allocations which include or are close to ancient semi-natural woodlands (**Forge Wood**, **Land SE of Heathy Farm**, **Tinsley Lane Playing Fields**, **Land adjacent to Desmond Anderson**).
- Natural England expresses disappointment regarding allocation of **Land South East of Heathy Farm**, which is identified as deciduous woodland habitat. Notes other biodiversity / landscape / public right of way constraints within or adjacent to other proposed allocations.
- Resident representations objected to allocation of **Land at Henty Close** on various grounds, including impact on local amenity, biodiversity, infrastructure and open space.
- Resident representation objects to proposed allocation of **Rushetts Road Playing Area** on grounds of amenity, existing use, and loss of open space.
- Request received from planning agents on behalf of developers to the consideration of **additional parcels of land in Forge Wood** for allocation as additional housing sites (and their reflection in the Local Plan housing requirement).
- Planning agent on behalf of Southern Gas Networks (SGN) explain that SGN are exploring potential for redevelopment of redundant gas holder sites, including that at Forge Wood, which is planned to be demolished. Expresses concern that status of **gas holder site at Forge Wood** within the draft Plan is unclear, recommending that stronger support is expressed for principle of residential development there, and that further work is undertaken by the council to consider the development potential of the site.

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

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

Meeting Housing Needs

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

Comments were received on Policies H5, H7 and H8.

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

Green Infrastructure & Biodiversity

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

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

- Support received from a Conservation Area Committee to **Policy GI1: Green Infrastructure**.
- Concern is raised in relation to how it will be possible to retain Green Infrastructure with the demand for housing.
- Woodland Trust welcomes **Policy GI1**, in particular relation to the use of Natural England's Accessible Natural Green Space standard and Woodland Trust's woodland access standard. Also welcomes the inclusion of requirement v11c, for large developments to provide new and/or create links to green infrastructure.
- Support received to Policy GI1 as appropriate and proportionate to the requirements for both green and blue infrastructure in accordance with national policy received from planning agents on behalf of a landowner promoting a site.
- Natural England welcomes the inclusion of the Green Infrastructure policy. Woodland Trust supported **Policy GI2: Biodiversity Sites** and strongly support the policy approach

that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. However, it should be strengthened with regard to buffering of ancient woodland. The policy approach in line with Natural England's standing advice is not believed to be sufficient. Instead, they consider the use of a 50m buffer as a precautionary principle.

- Support for **Policy GI2** from Natural England.
- Natural England highlighted that detrimental impacts to internationally designated sites in the vicinity, which have the potential to occur, need to be considered in relation to potential development within the Plan area and these sites should be referred to.
- Representations received from Natural England confirmed that the Plan should demonstrate how the impacts at Arun Valley SPA and Special Area of Conservation (SAC) and Ramsar sites will be avoided and mitigated.
- Support received from a site promoter for **Policy GI2**, as appropriate and proportionate for addressing Biodiversity and consistent with national policy.
- Sussex Wildlife Trust (SWT) note the amendments have been made based upon their initial comments (to Regulation 19 consultation 2020).
- Suggestion received that the first paragraph of **Policy GI2** should be amended: to remove section relating to past ecological surveys, as some sites may have not been previously surveyed but contain features that are recognised as valuable for wildlife.
- Specific landowner requests for the removal of certain areas of Biodiversity Opportunity Areas under **Policy GI2** – this was a repeated representation from the previous Regulation 19 consultation carried out in 2020.
- Sussex Ornithological Society concerned that there needs to be firmer protection relating to the High Weald AONB.
- Natural England support inclusion of **Policy GI3: Biodiversity and Net Gain**, in particular the need for proposals to demonstrate the securing of a Net Gain.
- Detailed representations from Natural England suggested that **Policy GI3** could be strengthened through the addition 'measurable' when referring to the Net Gain achieved, in line with the NPPF; that net gain should be incentivised on-site in the first instance and showing that the mitigation hierarchy was followed; and demonstrate the securing of management for Net Gain in perpetuity for the life time of the development.
- Natural England advised that SPD should be prepared to provide further details as to how Net Gain should be delivered and measured.
- Representations received from the Conservation Area Committee suggested that there should be a requirement for ecological studies of proposed development sites to be made public, and knowledge from local community who know the area should be sought after in **Policy GI3**.
- Representation from a site promoter supporting **Policy GI3** as provide appropriate and proportionate requirements to address biodiversity and net gain, and consistent with national policy.
- Concerns raised by SWT to **Policy GI3** suggest that it fails to adequately address what is required where BNG cannot be secured on-site. Suggests that CBC has a strategic plan in place to deliver BNG that is required off-site, and to ensure that gains are strategic and maximised.
- Representations received from planning agents on behalf of landowners are supportive of **Policy GI3** to deliver Biodiversity Net Gain which is in accordance with the Environment Bill (now The Environment Act).
- Concern is raised that the wording of **Policy GI3** does not make provisions for when net gains cannot be achieved on-site whether that be partially or in full, and suggests wording that could be used to inform such circumstances.
- Concern is raised that **Policy GI3** is repetitive of other policies in the Plan, in particular relation to tree replacement planting and landscaping and suggests that these two points should be removed.
- The Home Builders Federation object to **Policy GI3**, considering it to not be consistent with national policy.

- Support received for the commitment to achieving a minimum of 10% Net Gain.
- Concern that clarity is needed in **Policy GI3** in relation to the contribution of one new tree per new dwelling (or equivalent off-site contribution) to confirm that either contribution is required or it is not. Concern is raised that the ambition to increase in tree cover in the borough may come as an obstruction to building at higher densities, and particularly may not be feasible for new urban developments on constrained sites. It was suggested that there should be a reduction in the number of additional tree planting in urban areas, and a separate cost for tree planting should be included in the Crawley Local Plan Review: Whole Plan Policies & Community Infrastructure Levy Viability Assessment.
- Strong support was received for the designation of Ifield Brook Meadows and Rusper Playing Fields as Local Green Space (**Policy GI4: Local Green Space**), with them both being valued and important local features.
- Resident representations received raised objections to development of Ifield Brook and Ifield Golf Club, with development impacting the environment and nature; historic flooding in the area and future flood risk; benefits that the area brings to peoples physical and mental health; and an increase in people in the area will increase congestion and traffic and place additional burden on Crawley.
- Rusper Parish Council raised concerns about the Land at the West of Ifield: the proposed site would negatively impact upon Crawley's Local Plan.

Sustainable Design & Construction

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

Comments were received on Policies SDC1, SDC2 and SDC3.

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

Environmental Protection

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

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

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

- Representations from planning agents on behalf of a landowner question whether noise metrics should be included within the Local Plan.
- Representations received from Sussex Wildlife Trust requested amendment to **Policy EP6: External Lighting** to avoid unacceptable impacts on biodiversity.

Sustainable Transport

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

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

- Representations from planning agent on behalf of landowner promoting a site set out how their masterplan area can be delivered in consistency with Local Plan objectives on sustainable transport (**Policy ST1: Development and Requirements for Sustainable Transport**).
- Representations received from Highways England (now National Highways) confirm that work is ongoing as part of the Transport Study to establish the impact of the Local Plan on the strategic road network.
- Representations received from a site promoter considers that the approach set out in **Policy ST1** is consistent with national and CBC corporate policy and strategies, and sets out that the proposed Gatwick Green allocation (promoted by the representor) is consistent with this policy and with **Policy ST2: Car and Cycle Parking Standards**.
- Representations received from Gatwick Airport Limited (GAL) raise no objection to draft **Policy ST1**.
- Support is received from planning agents on behalf of landowners for the 'parking behaviour zones' identified in the **Parking Standards Annex**, referred to in **Policy ST2**.
- Concern is raised by the Home Builders Federation about lack of specific allowance within the Local Plan Viability Assessment for cost of providing electric vehicle charging points.
- The inclusion of local standards for installation of EV charging points is queried given that national requirements are being introduced via Building Regulations.
- Support is received for the element of flexibility in the **Parking Standards Annex** (referred to in **Policy ST2**) in respect of vehicle parking for older persons' accommodation.
- Concern is expressed regarding the requirement for a quota of active EV charging points as part of parking provision. As an alternative it is suggested that cabling could be provided to parking spaces, to be used for 'live' charging points at a later stage as needed. Sets out that cycle parking should not be required for residents of specialist older persons' accommodation.
- GAL confirm that following modification of **Policy ST3: Improving Rail Stations**, the previous objection to the policy no longer applies.
- Representations from the Crawley Town Centre Business Improvement District support **Policy ST3** in relation to Crawley Station in terms of the scope for enhanced pedestrian/cycling accessibility, better public transport provision, and better integration with the main shopping area.
- Resident Representations suggest the playing fields which would be affected by a southern runway at Gatwick Airport and/or a new link road for new development at the West of Ifield (**Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road**) should be replaced through the Local Plan.
- Sussex Ornithological Society confirmed their representations to **Policy ST4** made as part of the Regulation 19 2020 consultation continue to stand.

- Representations from WSCC raise concern that Policy GAT2: Safeguarded Land for the potential future additional wide spaced runway as per the Gatwick Airport Master Plan is in conflict with **Policy ST4** as substantial sections of the ST4 area lies within the GAT2 safeguarded area.
- Horsham District Council (HDC) support **Policy ST4**, subject to the need for the corridor for any future relief road to be agreed jointly with HDC as most of the route would be within the administrative area of Horsham.
- Objections received from planning agent on behalf of a site promoter to **Policy ST4** in its current form and the Proposals Map allocation as well as the principle of safeguarding land for a relief road, as premature.
- Representations received from the Conservation Area Committee to **Policy ST4** acknowledge its purpose, but raise concerns regarding the environmental impacts.
- GAL maintains its previous objection to **Policy ST4** and confirms, that since the reinstatement of the policy safeguarding land for future runway expansion to the south of Gatwick Airport, this is now strengthened by the inherent inconsistency between Policies GAT2 and ST4.
- Representations received from Sussex Wildlife Trust (SWT) raise concern as to the need for the link road and its impacts on biodiversity. The broad area appears to cover areas of known biodiversity value including a Local Wildlife Site and ancient woodland. SWT does not feel the current policy wording reflects the clear need with the NPPF section 175 to follow the mitigation hierarchy and avoid impacts in the first instance.
- Support received from the Woodland Trust to the supporting text to **Policy ST4** confirming new highways crossing across Ifield Brook Meadows would be wholly unacceptable.
- Concern received from the Woodland Trust to **Policy ST4** that the search area for the proposed link road includes ancient woodland at Rowley Wood ASNW.
- Representations received from Rusper Parish Council raise concerns that the western link road would have an adverse effect on Ifield Brook Meadows as the proposals seem to have cycle ways through parts of this Conservation Area.

Noise Annex

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

- Concern the contour map is not clear enough.

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

Duty to Cooperate

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

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

Sustainability Appraisal/Strategic Environmental Assessment

Comments on the Sustainability Appraisal/Strategic Environmental Assessment were received from seven representors: Sussex Ornithological Society, The Wilky Group, Reigate

and Banstead Borough Council, HX Properties Ltd., Danescroft (RLP Crawley) LLP, Gladman Developments and Squires Planning.

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

Local Plan Map

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

- Representations from planning agents on behalf of landowners promoting sites for development request that the **Built-Up Area Boundary (Policy CL8)** is extended to include their sites.
- Representations received from the site promoter of **Gatwick Green Strategic Employment Site (Policy EC4)** requests changes made to the Local Plan Map in relation to their site.
- Representations promoting a **new site allocation** were received.
- Representations received from WSCC request the **Minerals Safeguarding Area** is shown on the Local Plan Map.
- Representations from a planning agent on behalf of a landowner promoting a site for development request that the **Manor Royal Boundary (Policy EC2)** is extended to include the whole of their site.
- Objections are received to the **safeguarding of land for Gatwick Airport** (**Policy GAT2**).

Habitats Regulations Assessment

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

- Reigate and Banstead Borough Council (RBBC) acknowledge the draft HRA takes into account their previous representations made to the Regulation 19 2020 consultation.
- RBBC do not dispute the conclusions that the Bechstein's bat habitat (at Mole Gap to Reigate Escarpment Special Area of Conservation) will not be affected by the Local Plan

and habitat loss and fragmentation will not be considered further in the HRA process, in line The Bat Conservation Trust ("BCT") guidance on thresholds for Core Sustenance Zones ("CSZ").

- RBBC do not dispute the decision that the site will not be considered further in the HRA process in terms of public access and disturbance, but recommend that strong consideration is taken for any large development sites.
- RBBC raise significant concern with regards to potential impacts from **Policy EC4 Strategic Employment Location** site development as it does not include freight traffic to/from the planned logistics site, which will be a much more significant part of the site traffic than employees' cars.
- Mid Sussex District Council remain concerned about the HRA work undertaken to support the Crawley Local Plan as it appears that no detailed transport modelling, air quality modelling and ecological interpretation to assess any impact on the Ashdown Forest SAC has been undertaken and considers that this modelling work and the next version of the HRA will need to be undertaken prior to submission of the Local Plan for examination.
- Natural England highlight the issue of Hardham groundwater abstraction serving Southern Water's Sussex North Water Resource Zone, and emerging evidence which indicates that an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar features could not be excluded with certainty. Whilst the adverse effect remains or is uncertain, development in Crawley must be certain not to add to this adverse effect. This will need to be tested through Crawley Local Plan's HRA, and again we welcome ongoing involvement in this process and the work that Crawley has undertaken thus far to assess this impact through the HRA. Once this has been completed it will support the test of soundness for the Local Plan. This requirement should be an essential target in the Sustainability Appraisal. With clear links to the quantum of housing numbers coming forward.

Viability Assessment

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

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

Strategic Housing Land Availability Assessment

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

- North East Sector, Gas Holder site (Site Ref: 73): the council should work positively and proactively to overcome constraints and brownfield land within the Forge Wood Neighbourhood should be defined and classified as residual land in which the principle of development is supported. A further assessment of the site and wider area should be undertaken to determine its development potential.

Local Development Scheme

Concerns were raised by one representor in relation to the Local Development Scheme: Squires Planning.

- Evidence documents were not published before the start of the consultation, and so had been left out of drafting the Local Plan.
- The consultation was due to end after the timetabled submission, and so would not be in conformity with the Local Development Scheme, which would not be rectifiable through retrospective changes.

Statement of Community Consultation
Concerns were raised by one representor in relation to the Statement of Community Consultation: Squires Planning. • There has been insufficient consultation with stakeholders and preparation of the necessary evidence to support the proposed policies and allow meaningful engagement with the public through this Regulation 19 consultation. • This is not in the spirit of the Council's Statement of Community Involvement and may fail the legal compliance test in this regard.

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

5. Further Publication (Submission) Consultation (Regulation 19)

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

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

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

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

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

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

5.5 On this basis, the amended draft Plan was considered again at Full Council held on 22 February 2023. At this meeting, Full Council approval for a further stage of Regulation 19 Publication Consultation was agreed, along with approval for the Local Plan's subsequent submission to the Secretary of State for its independent examination.

5.6 The Local Plan which was considered by Full Council on 22 February 2023 and published for Regulation 19 consultation (between May and June 2023) is a new Submission Draft Local Plan. However, much of the draft Local Plan Review and its Key Documents and Evidence Base are already established and remain the same as approved by Full Council in December 2020.

5.7 Whilst it is an amended Local Plan due to Water Neutrality and the passing of time, representations were open to be made on the whole document (for example, where objectors wished to highlight other matters they believe have changed).

Representations to Earlier Consultations

5.8 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

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

noted that these were considered in the context of the preparation of the Local Plan for the initial Regulation 19 Publication 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 and Additional Publication Consultations and which may supersede the council's previous intentions.

5.9 Furthermore, the council has not directly responded to representations made during either of the two previous Publication Regulation 19 Consultations (January 2020 and January 2021) as part of this Consultation Statement document. However, these have all been considered in depth as part of the updates to the Local Plan and have resulted in changes, where considered appropriate.

5.10 Representations duly made previously during the consultation carried out between January and March 2020 and January and July 2021 have been retained and will be submitted to the Inspector in their entirety, unless new representations clearly state they supersede those made previously. On this basis, it was not necessary for any representor to resubmit previously made comments, or provide comments made on elements of the Local Plan which have not been subject to any change since the previous Regulation 19 Consultation. This was clearly explained in the consultation materials.

5.11 Representations received during the Initial Publication Consultation (2020) are set out verbatim in a standardised tabular form in Appendix 4; from the Additional Publication Consultation (2021) in Appendix 6; and from the Further Publication Consultation (2023) in in Appendix 8 of this Consultation Statement. In addition, all representations will be published in PDF to the council's Local Plan Review examination webpages.

How the consultation was conducted

5.12 For the Further Publication Stage of the Local Plan Review, the council published the following Consultation Final Key Documents for scrutiny and comment:

Key Documents:

- Submission Crawley Local Plan 2024 – 2040 (May 2023)
- Local Plan Map
- Sustainability Appraisal/Strategic Environment Assessment Draft Report
- Habitat Regulations Assessment Draft Report
- Draft Consultation Statement
- Draft Infrastructure Plan
- Duty to Cooperate Statement & agreed Statements of Common Ground
- Monitoring and Implementation Framework

Supporting Technical Evidence Base:

5.13 The following additional evidence was published alongside the Submission Local Plan, in addition to the existing evidence base already available on the council's Local Plan Review webpage:

- Joint Topic Paper: Water Neutrality, May 2023 (Crawley Borough Council, Chichester District Council and Horsham District Council);
- Topic Paper 1: Unmet Needs and Duty to Cooperate, May 2023;
- Topic Paper 2: Gatwick Airport, May 2023;
- Topic Paper 3: Housing Needs, May 2023;
- Topic Paper 4: Housing Supply, May 2023;
- Topic Paper 5: Employment Needs and Land Supply, January 2021;

- Topic Paper 6: Climate Change, May 2023;
- Topic Paper 7: Development and Noise Technical Appendix, January 2021;
- Topic Paper 8: Biodiversity Net Gain and Urban Greening, May 2023.
- Viability Assessment Update, December 2022
- Compact Residential Development Study, May 2023
- Economic Growth Assessment supplementary update for Crawley, January 2023
- Employment Land Trajectory, 31 March 2023
- Employment Land Availability Assessment, 31 March 2023
- Housing Trajectory, March 2023
- Strategic Housing Land Availability Assessment, February 2023
- Windfall Statement, May 2023
- Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment Consultation Draft, May 2023
- Water Neutrality Study Part A – individual authority areas, July 2021
- Water Neutrality Study Part B – in combination assessment, April 2022
- Water Neutrality Study Part C – Water Neutrality Strategy, December 2022
- Crawley Transport Study, June 2022
- Crawley Western Link Road Northern Section Study Refined Area of Search, March 2023

5.14 These documents were all made available online on the council's dedicated website: https://crawley.gov.uk/planning/planning-policy/local-plan/local-plan-review (please note that since the close of consultation these webpages have been updated and the evidence documents have been organised into topic-based pages).

5.15 Paper copies of the documents were made available in the Town Hall and Crawley Library.

5.16 An online questionnaire was available for representations to be provided directly on the Local Plan Review webpage. In addition, paper copies of a Representation Form and accompanying Guidance Note were available for people to take and send in by post at the Town Hall and Library. This form was also available on request via email. Email representations were also accepted where these provided the necessary information in relation to the formal consultation.

5.17 For this consultation, representors were asked to provide their contact details, and were asked to confirm whether they consider the Plan to be:

- ✓ Legally Compliant
- ✓ Sound

5.18 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

5.19 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).

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

Summary of Representations Received

5.21 In total, 67 individuals, business and organisations submitted formal representations to the Local Plan consultation. These included comments on the:

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

5.22 Representors included:

- local residents;
- neighbouring Local Authorities (Chichester, Horsham, Mid Sussex, Reigate and Banstead, and Wealden District and Borough Councils, West Sussex and Surrey County Councils, Horley Town Council and Slaugham Parish Council);
- landowners, developers, house builders and Planning Consultants (Heine Planning Consultancy, Tony Fullwood Associates, BYM Capital, Arora Management Services Ltd., Panattoni UK, 90 North Group Limited, Persimmon, Bellway Homes, AIPUT, WT Lamb Properties, Staminier Group and Elliot Metals/The Simmonds Family, Ardmore Land Consortium, Gladman Development Ltd., A2 Dominion Group, Oxford Match Limited, Universities Superannuation Scheme, Gatwick Green Ltd. (previously known as The Wilky Group), Wates, Ardmore Ltd, Chichester College Group, Invia Group Ltd., DT Last Mile Retail (Crawley) Unit Trust, The Planning Bureau Ltd., Muller Property Group);
- local businesses (Gatwick Airport Limited, HX Properties)
- government departments, national agencies (Environment Agency, Historic England, Homes England, National Highways, Natural England, NHS Sussex ICB, and Sport England);
- Infrastructure Providers (Network Rail, Thames Water); and
- specific interest groups (Home Builders' Federation, Save West of Ifield, The Ifield Society, Sussex Ornithological Society, CPRE Sussex, The Woodland Trust and Sussex Wildlife Trust).

5.23 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 8 of this report. Council responses have not been prepared against these representations received.

Table 8: Further Publication (Regulation 19) Consultation Summary of Main Issues 2023

Local Plan General & Vision
General comments on the Local Plan and its vision were received from nine representors. These included national government agencies, developers/landowners; business and specific interest groups: National Highways; Gatwick Airport Limited; Environment Agency; Network Rail; Natural England; WT Lamb Properties, the Dye Family and Elliot Metals/the Simmonds Family; Gatwick Green Ltd.; Save West of Ifield Campaign; and A2 Dominion. *Comments were received on the strategic approach to transport, housing including unmet needs and urban extensions, Gatwick Airport, economy, health care provision and infrastructure facilities and the environment, particularly water quality.* • Request for further demonstration regarding the consistency of the Local Plan with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of

sustainable development', in order to confirm that the Plan is consistent with national policy.

- Concern that the plan does not meet 'positively prepared' soundness test given scale of unmet housing need and the apparent lack of clear plans for meeting this need across the wider HMA. This is of concern given the potential impact which options for displacement of residential development into neighbouring districts could have on the Strategic Road Network.
- Concern that the plan falls short of meeting the 'justified' soundness test because the Crawley Transport Study does not make proportionate allowance for the scale of development which could come forward in the later part of the Local Plan period, and the forecast year given in the Study (2035) falls five years before the Local Plan end date (2040).
- Issues were raised in respect of the level of unmet housing need and the apparent lack of clear plans for meeting this within the HMA, as well as apparent deficiencies regarding the Transport Study and Infrastructure Plan. Concern that the plan falls short of meeting the 'effectiveness' soundness test as a result.
- Concern that the plan strategy fails to take adequate account of the 2019 Gatwick Airport Masterplan and progress made in relation to Development Consent Order proposals in respect of the northern runway.
- Concern that the plan strategy does not accord with the need to safeguard land for the potential delivery of an additional wide-spaced southern runway and associated infrastructure during the Local Plan period.
- Concern that the plan strategy is based on an underestimation of economic growth potential and associated demand for employment land.
- Recommendation of variation to wording of discussion of urban extensions in **paragraphs 2.30-2.33**.
- Concern that the strategy is undermined by Crawley Borough Council's limited influence over strategic development proposed immediately outside the borough boundary, e.g. the West of Ifield proposals being promoted by Homes England.
- Concern that the strategy provides insufficient clarity as to how additional healthcare provision and other facilities will be delivered, and insufficient appreciation of increased strain on local facilities arising from strategic development proposed adjacent to the borough.
- A clearer statement of intention is requested in relation to the pursuit of partnership working as a means to improve water quality.
- Other general comments were made regarding the suitability of the Local Plan Vision and soundness of the overall strategy.

Sustainable Development

Comments on this Chapter were received from five representors. These included those from neighbouring local authorities, national government agencies and specific interest groups: National Highways; Woodland Trust; Sport England; Save West of Ifield Campaign; and Mid Sussex District Council.

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

- Policy SD1: 'Presumption in favour of Sustainable Development' requires closer alignment with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of sustainable development'.
- Policy SD2: 'Enabling Healthy Lifestyles and Wellbeing' requires stronger emphasis on need for 'visions' for developments, incorporating sustainable travel principles in accordance with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of sustainable development'.
- Policy SD2 gives inadequate recognition of the impact on existing health services and community facilities arising from strategic development proposed adjacent to the borough.

- Minor changes to supporting text of Policy SD2: 'Enabling Healthy Lifestyles and Wellbeing' are requested in order to reflect updated Sport England principles statement.
- Expression of disappointment regarding deletion of Policy SDC3: North Crawley Area Action Plan.

Character, Landscape & Development Form

Comments on this Chapter were received from 14 representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, local residents and specific interest groups: Ardmore Ltd; Mid Sussex District Council; Horsham District Council; local resident; Chichester District Council; Muller Property Group; Gatwick Green Limited; Universities Superannuation Scheme Ltd.; Ifield Society; Sussex Ornithological Society; Homes England; Manor Royal BID; Save West of Ifield Campaign; and Natural England.

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

Movement Patterns, Layout and Sustainable Urban Design

- Claim that **Policy CL3: Movement Patterns, Layout and Sustainable Urban Design** renders the Strategic Employment Allocation at Gatwick Green unsound and unjustified.
- Clarification from Mid Sussex District Council that previous comments made in March 2020 and June 2021 remain relevant.

Compact Development – Layout, Scale and Appearance

- Support for **Policy CL4: Compact Development – Layout, Scale and Appearance** in principle, but consider it is not justified as stands.
- Horsham District Council sought that a further update to the evidence base document to provide a spatial analysis of what density ranges are appropriate in given contexts, more explanation of the methodology for determining them and a presentation of the town's existing density levels.
- Mid Sussex supported **Policy CL4** in principle but suggested that the Policy would be more effective if the 'appropriate levels of accessibility to enhance public transport services' are defined.
- Concern that 'dwellings per hectare' as a means of definition is rather vague.
- General comment that distance between dwellings should be defined within **Policy CL4**, particularly as it relates to fire regulations and maintenance requirements.
- Support for the high-density targets for the Town Centre and accessible locations.

Structural Landscaping

- Query regarding the methodology used in identifying, determining and justifying individual plots or specific areas of structural landscaping established by **Policy CL6: Structural Landscaping**.
- Concern that the policy appears to be attempting to introduce a new layer of protection where none currently exists and that the wording of the Policy and some of the areas identified as Structural Landscaping make the policy unsound.

Important and Valued Landscape and Views

- Support that **Policy CL7: Important and Valued Landscape and Views** is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG).
- Support that **Policy CL7** provides appropriate and proportionate protection for important and valued views in the borough,
- Support the commitment to protect and/or enhance Important and Valued Views.
- Concern regarding long distance views portion of the policy. Suggestion that it should be edited to clarify that each development's impact should be considered on its own merits.

Development Outside the Built-Up Area

- The Ifield Society requested **Policy CL8: Development Outside the Built-Up Area** is modified to include a submitted proposal for a Local Nature Reserve and Heritage Site- as part of the West of Ifield Rural Fringe.

- Sussex Ornithological Society claim that that the Local Plan is unsound in:
  (a) proposing to allow or support development in the High Weald Area of Outstanding Natural Beauty (AONB) in the borough and beyond;
  (b) failing to have identified and safeguarded ecological networks;
  (c) in deferring cross-boundary strategic matters that should have been addressed;
  (d) not complying with the NPPF requirement for an environmental objective that protects and enhances the natural environment.
- Claim that the Local Plan allows or supports further development that would remove green space and wildlife habitats in the High Weald AONB, and in the Tilgate area.
- Claim that **Policy CL8** implies potential support for new development delivered by neighbouring councils in the AONB.
- Claim that **Policy CL8** does not sufficiently recognise the council's duty to safeguard the ecological networks that cross the boundaries of the borough into adjacent council areas.
- Claim that the Local Plan is unsound in not complying with the NPPF requirement for an environmental objective that protects and enhances the natural environment.
- Suggestion that there is no evidence in the Local Plan of work done to identify wildlife-rich habitats, wider ecological networks and wildlife corridors as required by the NPPF – particularly in the "area of search" for the proposed western relief road.
- Suggestion that duty to cooperate requirements have not been addressed, in relation to ecological issues, with adjoining councils.
- Ardmore Ltd request that the **Built-Up Area Boundary** (BUAB), as it relates to the Upper Mole Farmlands Rural Fringe, should be realigned to take into account of their site.
- Claim that the BUAB is at odds with **Policy ST4** for the Crawley Western Multi-Modal Transport Corridor Link.
- Manor Royal BID recommend the review of the countryside policies in light of continued safeguarding and the Area of Search for the Multi-Modal Transport Link Corridor.
- Claim that **Policy CL8** is unsound and unjustified as the development at Jersey Farm indicates a need to review the BUAB on the proposals map.
- Homes England supports **Policy CL8** and supporting text in **paragraph 4.70**.
- Homes England suggest some modifications to the Ifield Fringe Character Area.
- Clarification from Mid Sussex District Council that previous comments made, from January 2020, continue to apply.
- Save West of Ifield Campaign requested that **Policy CL8** be updated to reflect the Crawley Borough Council Full Council motion, passed unanimously on 20th October 2021, that 'Crawley Borough Council formally re-states its strongest possible opposition to the Homes England proposal to build up to 10,000 new homes to the west of Ifield/Crawley'.
- Request that **Policy CL8** should be updated to reflect the need to control types of excessively bright and spreading security lights on existing buildings.
- Natural England confirmed general support for **Policy CL9: High Weald Area of Outstanding Natural Beauty** requirements for relevant proposals to consider impacts on the High Weald AONB.

Design & Development Requirements

Comments on this Chapter were received from eight representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: Thames Water; Horsham District Council; Woodland Trust; Natural England; Surrey County Council; Oxford Match Ltd.; The Planning Bureau; and Gatwick Airport Limited.

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

Normal Requirements of All New Development

- Suggestion that **Policy DD1: Normal Requirements of All New Development** should contain the requirement that a technical assessment should be undertaken by the developer or by the council in consultation with Thames Water for any proposed development within 800m of Crawley Sewage Works.

- Support by Horsham District Council, stating that **Policy DD1** is clear in its encouragement of efficient use of land as part of good design.
- Support for **Policy DD1** by Woodland Trust, particularly in relation **DD1g** and **paragraph 5.15** that where loss of trees should be mitigated by new planting.
- Support also for **Policy DD1** requirement **DD1g** by Natural England.
- Surrey County Council support the requirement for waste and recycling storage to be designed into new housing development schemes from the start (**Policy DD1**, **criteria i**).
- Surrey County Council raised concern that a requirement for the sustainable management of construction, demolition, and excavation waste is not included. That such a requirement is in accordance with West Sussex Waste Local Plan 2014, Policy W23: Waste Management within Development.

Standards for all New Developments – Including Conversions

- Concern that **Policy DD3: Standards for all New Developments – Including Conversions criteria iv** encourages minimum clear floor to ceiling height of 2.7m for 3-person 2-bedroom units and above.
- Concern that **Policy DD3 criteria v** requires private outdoor open space to be 2.5m deep by 4m wide, and is potentially too large for town centre schemes,
- Claim that **Policy DD3** will not make the most efficient use of deliverable land, and particularly constrain town centre sites, and that **Policy DD3** could undermine and conflict with **Policies CL2** and **CL3** (using land more efficiently and sustainably).
- The Planning Bureau repeated its concern that the policy fails to properly consider the cumulative impact of what it expects new development to achieve due to the associated development costs **Policy DD3** places on new development.
- Suggestion that the council should instead remove **Policy DD3** and only rely on the Nationally Described Space Standards (NDSS) and the suggestion that there is no need to repeat government policy within **Policy DD3**.

Policy DD4: Tree Replacement Standards

- Thames Water supports the reference to take existing sewage and water infrastructure into account when planting trees and recognises the environmental benefits of planting trees. Also highlights that for the public sewers and water supply network to operate satisfactorily, trees and shrubs should not be planted over the route of the sewers or water pipes.
- The Woodland Trust supports **Policy DD4: Tree Replacement Standard**'s proposed ratio for tree replacement, which also reflects the Woodland Trust Guidance. In addition, the Trust also welcomes the inclusion of guidance in **paragraph 5.37** that, where possible, UK sourced and grown tree stock to support biodiversity and resilience.
- **Policy DD4** is also supported by Natural England as it is in line with the NPPF and commitments and actions of the EIP.
- Comments received from the Planning Bureau reiterate **Policy DD4** has not been amended in light of their original objections.

Policy DD5: Aerodrome Safeguarding

- Gatwick Airport Limited support the policy and welcomed amendments made following the last round of public consultation. GAL has suggested further modifications to the supporting text to ensure their technical accuracy.

Heritage

Comments on this Chapter were received from five representors. These included a national government agency, landowner/developers and a specific interest group: Historic England; Gatwick Green Limited; Save West of Ifield Campaign; Chichester College Group; and Muller Property Group.

Comments were received on the Chapter as well as specific Policies HA1, HA4, and HA5.

- Support for the overall approach proposed to the conservation and enhancement of the historic environment, with **Policy HA1: Heritage Assets** as the strategic policy.
- Acknowledgement of update to Heritage evidence base in the form of the 2021 Crawley Heritage Assets Review.
- Commentary supporting consistency of **Policy HA1**, **HA4: Listed Buildings and Structures**, and **HA5: Locally Listed Buildings** with **Policy EC4: Strategic Employment Location**.
- Query as to why list of designated and non-designated heritage assets in **Policy HA1** does not mention village greens or Ifield Village Green, which does not appear on the **Local Plan Map**.
- Objection that **Policy HA5** goes beyond National Policy in the level of protection given to Locally Listed Buildings.
- Objection to approach/evidence in relation to application of **Policy HA5** to assessment of individual buildings, as based on the 2021 Crawley Heritage Assets Review.

Open Space, Sport & Recreation

Comments on this Chapter were received from four representors. These included the County Council, a national government agency and specific interest groups: Save West of Ifield Campaign; Woodland Trust; Natural England; and West Sussex County Council.

Comments were received on the Chapter as well as specific Policies OS2 and OS3.

- A generic comment for Chapter 7 was submitted, which finds the policies in this Chapter to be sound but drew attention to the impacts on Crawley and its residents, should Horsham District Council progress the proposed West of Ifield development, referencing Ifield Golf Course, Ifield Brook Meadow and the rural fringe.
- Comments were received in support of **Policy OS2: Provision of Open Space and Recreational Facilities**. The Woodland Trust supports the inclusion of Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland. Natural England supports the policy as it is line with the NPPF and goals and actions of the EIP
- West Sussex County Council commented on **Policy OS3: Public Rights of Way and Access to the Countryside**, withdrawing their previous comments made as the Policy has been changed to be more positively prepared and in accordance with the NPPF.

Infrastructure Provision & Infrastructure Plan

Comments on this Chapter were received from 11 representors. These included the county councils, government agencies, infrastructure providers, a landowner and planning agent, a business and a specific interest group: Thames Water; West Sussex County Council; Gatwick Green Limited; Gatwick Airport Limited; Environment Agency; NHS Sussex ICB; Save West of Ifield Campaign; Surrey County Council; National Highways; Homes England; and 90 North Group Limited.

Comments on the Infrastructure Plan were received from four representors: West Sussex County Council; Environment Agency; Surrey County Council and Network Rail.

Comments were received on Policies IN1 and IN2 as well as on the Infrastructure Plan.

- Expressions of support for the overall approach set out in **Policy IN1: Infrastructure Provision** and **Policy IN2: The Location and Provision of New Infrastructure**.
- Comments regarding need for engagement between the council, developers and Thames Water as the sewerage provider in respect of proposed developments.
- Recommendation that wording be included in **Policy IN1** regarding waste water infrastructure, including statement that occupation may be restricted by phasing condition where there are capacity constraints, and information regarding process for securing a sewerage connection.

- Request for additional wording in **Policy IN1** regarding the approach to be taken in working with stakeholders to secure delivery of necessary mitigations, including reference also to further detail regarding phasing/delivery of mitigation schemes to be provided in an amended/updated Infrastructure Plan.
- Request for additional wording in **Policy IN1** regarding how CIL and planning obligations will be used to support delivery of necessary mitigations.
- Request for change to wording of **Policy IN1** to provide further clarification regarding the approach to the delivery of necessary infrastructure.
- Comments regarding need for additional transport infrastructure to mitigate 'out of town' developments - including upgrade to Ifield Station, and appropriate cycling/walking routes.
- Comments regarding anticipated funding needs for additional General Practice capacity.
- Commentary regarding primary and secondary school capacity in Horley area.
- Recommendations that **Policy IN2** be made more explicitly supportive of expansion of specified forms of infrastructure and/or facilities, including waste water facilities and educational establishments.
- Recommendation that **Policy IN2** be worded to reflect need for new infrastructure to be located in accessible areas.
- Query as to whether waste water capacity constraints referred to in **Policy IN2** supporting text are compatible with proposed levels of housing growth.
- Recommended change to wording of supporting text of **Policy IN2** in respect of need for additional secondary education provision, to reflect latest evidence.

<u>Infrastructure Plan</u>

- Expressions of support for the overall approach set out in **Policy IN1: Infrastructure Provision** and **Policy IN2: The Location and Provision of New Infrastructure**.
- Comments regarding need for engagement between the council, developers and Thames Water as the sewerage provider in respect of proposed developments.
- Recommendation that wording be included in **Policy IN1** regarding waste water infrastructure, including statement that occupation may be restricted by phasing condition where there are capacity constraints, and information regarding process for securing a sewerage connection.
- Request for additional wording in **Policy IN1** regarding the approach to be taken in working with stakeholders to secure delivery of necessary mitigations, including reference also to further detail regarding phasing/delivery of mitigation schemes to be provided in an amended/updated Infrastructure Plan.
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- Comments regarding need for additional transport infrastructure to mitigate 'out of town' developments - including upgrade to Ifield Station, and appropriate cycling/walking routes.
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- Recommendations that **Policy IN2** be made more explicitly supportive of expansion of specified forms of infrastructure and/or facilities, including waste water facilities and educational establishments
- Recommendation that **Policy IN2** be worded to as to reflect need for new infrastructure to be located in accessible areas.
- Query as to whether waste water capacity constraints referred to in **Policy IN2** supporting text are compatible with proposed levels of housing growth.
- WSCC recommended changes to wording of supporting text of **Policy IN2** in respect of need for additional secondary education provision, to reflect latest evidence. Homes

England has also questioned the evidence to the educational need requirements and proposed modifications.

Economic Growth & Employment Land Trajectory

Comments on this Chapter were received from 21 representors. These included a local resident, neighbouring local authorities and the county council, landowners and planning agents, businesses and specific interest groups: National Highways; Lamb Properties, the Dye Family and Elliott Metals/the Simmonds Family; Horsham District Council; Ardmore Ltd.; The Barker Trust; Gatwick Green Limited; Oxford Match Ltd.; Wealden District Council; Gatwick Airport Limited; Universities Superannuation Scheme Ltd.; West Sussex County Council; Homes England; Reigate and Banstead Borough Council; Mid Sussex District Council; Horley Town Council; Local Resident; BYM Capital; Manor Royal BID; Natural England; and HX Properties Ltd.

Comments were received on the Employment Land Trajectory from one representor: Gatwick Green Limited.

Comments were received on Chapter 9 generally as well as specific Policies EC1, EC2, EC3, EC4, EC5, EC7, EC9, EC11 and on the Employment Land Trajectory.

General Chapter Comments:

- National Highways requested clarity as to whether employment numbers underpinning the Transport Study Report (2022) have changed in the most recent iteration of the Reg. 19 Local Plan.

Policy EC1: Sustainable Economic Growth

- Site promoter objections to **Policy EC1: Sustainable Economic Growth** considered the Plan figure to under-estimate the employment land requirement. They principally considered the perceived shortfall to be an implication of failing to include uplift for significant levels of market demand for industrial and logistics. Wider factors also felt to have artificially supressed the employment land requirement include (but are not limited to) pandemic economic impacts on forecasts, a perceived failure to account for net losses in employment land, and a lack of adjustments to account for growth lost due to historic land supply constraints.
- Gatwick Green Limited supported the proposed employment allocation but objected to **Policy EC1** considering that it is not positively prepared given the absence of a market demand uplift to employment figures.
- Several representations provided additional market analysis, considering Crawley's employment needs for the Plan period to range between 48ha and 118h. Two representations put forward that a figure of 69ha most closely reflects Crawley's need with market demand factored in.
- Gatwick Airport Limited has objected to **Policy EC1**, considering it to conflict with national aviation policy, and arguing that the scale of Crawley's employment need is not sufficient to justify the proposed allocation. GAL advises that Crawley's employment needs should therefore be met elsewhere, potentially through Duty to Cooperate.
- Horsham District Council supported **Policy EC1**, subject to some modifications reflecting the status of its Local Plan progress. Wealden District Council supported the policy approach.
- BYM Capital support subsections i. ii. and iii of **Policy EC1** but believe that reference to "outside of safeguarding" should be removed.

Policy EC2: Economic Growth in Main Employment Areas

- Gatwick Airport Limited objected to **Policy EC2: Economic Growth in Main Employment Areas**, suggesting alternative wording in relation to Lowfield Heath main employment area, to reflect its location within the GAT2 safeguarded land.
- Separately, one representation considered there should be greater flexibility to support residential uses in main employment areas, suggesting modified wording to this effect.
- BYM Capital support **Policy EC2** but suggest an additional criteria relating to alternative employment uses.

Policy EC3: Manor Royal

- WSCC requested inclusion of the brick clay minerals consultation area on the Local Plan Map and reference to the West Sussex Joint Minerals Local Plan, 2018 (Partial Review 2021) and the West Sussex Waste Local Plan (2014) in the policy context.
- Homes England support the principles of **Policy EC3: Manor Royal** and welcome the policy direction that this business district should be enhanced through development. They support the reference in the supporting text **paragraph 9.46** that the Draft Crawley Local Plan should take a positive approach to the growth of the industrial area and promote the Rowley Farm site as a location for the expansion of Manor Royal to the north, if it were to be removed from the Gatwick Safeguarding Zone following a change in national aviation policy.
- BYM Capital support **Policy EC3: Manor Royal** but object to the reference to existing DPG and guidance.
- Manor Royal BID requests assurance of the protection of Manor Royal from Permitted Development residential conversions.
- Manor Royal BID supports reference to the Manor Royal business hub in the supporting text to **Policy EC3**.

Policy EC4: Strategic Employment Location

- Gatwick Green Limited (GGL) reiterated its support for the allocation (**Policy EC4: Strategic Employment Location**), considering this to clearly reflect the council's Local Plan vision, though GGL objected to the policy as drafted, suggesting policy modifications relating to the type/quantum of floorspace, transport matters, and delivery timeframes.
- Reigate & Banstead Borough Council set out its support for **Policy EC4**.
- Natural England has outlined its support for the mitigations proposed within **Policy EC4**, though have suggested that specific wording is strengthened.
- Other site promoters have objected to the allocation, favouring instead sites they are respectively promoting, or have advised that their promoted sites should be allocated in addition to Gatwick Green given the scale of employment need:
  - Vail Williams on behalf of the Ardmore Land Consortium considers its site to represent a natural extension to Manor Royal and therefore a more sustainable location. Its representation considers Gatwick Green to conflict with various Local Plan policies.
  - Quod on behalf of the Barker Trust consider there to be flaws in the transport evidence that would render the Gatwick Green allocation undeliverable, promoting instead its Manor Royal Extension as an alternative allocation.
  - LRM Planning on behalf of WT Lamb Properties et al, support the Strategic employment Location allocation but consider a larger site, including their own land, is needed.
- For the Gatwick Green allocation, and in relation to sites that are not proposed for allocation, submissions have been accompanied by supporting evidence considering (but not limited to) matters of landscaping/ecology, master planning, transport and drainage.
- National Highways set out that **Policy EC4** should outline a clear vision and outcomes for sustainable transport solutions, for both the construction and operational phases.
- Manor Royal BID requested stronger emphasis on the importance of promotion of Manor Royal in pursuing the Strategic Site Allocation.
- Both Mid Sussex District Council and Horley Town Council have continued to raise concerns relating to transport impacts.
- One further resident objection was received.

Policy EC5: Employment and Skills Development

- Support was expressed for the approach of **Policy EC5: Employment and Skills Development**, though modifications have been suggested to provide greater policy flexibility.

Policy EC7: Hotel and Visitor Accommodation

- Gatwick Airport Limited reiterated its support for the approach of **Policy EC7: Hotel and Visitor Accommodation**.
- Holiday Extras has objected to **Policy EC7**, arguing that the sequential test should continue to be applied to hotel and visitor accommodation, and considering there to be inconsistency of approach between on and off-airport hotels with regards to airport-related parking.

Policy EC9: Supporting the Creative Industries

- Manor Royal BID requested more information regarding **Policy EC9: Supporting the Creative Industries**.

Policy EC11: Employment Development and Amenity Sensitive Uses

- Manor Royal BID request clarification regarding **Policy EC11: Employment Development and Amenity Sensitive Uses**.

Employment Land Trajectory

- Gatwick Green Limited reiterated points raised under EC1 and EC4 (quantum of allocation land/floorspace and delivery timeframes) in relation to the Employment Land Trajectory, suggesting modifications that would in its view ensure the ELT is sound.

Gatwick Airport

Comments on this Chapter were received from 20 representors. These included a national government agency, the county council, infrastructure provider, neighbouring authorities, landowners and planning agents, businesses and specific interest groups: West Sussex County Council; Save West of Ifield Campaign; National Highways; Horsham District Council; Gatwick Airport Limited; Natural England; Thames Water; Lamb Properties, the Dye Family and Elliott Metals/the Simmonds Family; Ardmore Ltd.; Homes England; The Barker Trust; Gatwick Green Limited; Sussex Wildlife Trust; Woodland Trust; Arora Management Services; BYM Capital; Panattoni UK; AITUP; Manor Royal BID; and HX Properties Ltd.

Comments were received on the Gatwick Airport Runway Project DCO as well as specific Policies GAT1, GAT2, GAT3 and GAT4.

Policy GAT1: Development of the Airport with a Single Runway

- WSCC and National Highways request consideration of the potential cumulative impacts on the transport network from the forecast airport growth and the Local Plan.
- Given the uncertainties relating to aviation, assumptions on airport growth are queried and updates to passenger figures are requested. Impacts of airport growth on housing demand and the need to diversify the economy should be reflected in the Plan.
- The Save West of Ifield Campaign suggests the potential noise impacts on residents in the potential West of Ifield development should be recognised.
- Horsham DC supports the principle of **Policy GAT1: Development of the Airport with a Single Runway** but seeks inclusion of references to cumulative impacts,
- GAL objects to the description of Gatwick Airport as a single runway, two terminal airport in **Policy GAT1**. It objects to all the amendments to Criterion ii) arguing the revised "balance" assessment fails to give weight to the positive benefits of airport growth, and should not reference compensation. GAL supports the new criterion iii) subject to the reference to compensation being deleted.
- Natural England supports Criteria ii and iii of **Policy GAT1** but recommends detailed wording changes regarding the mitigation hierarchy and compensation.
- Manor Royal BID is supportive of growth at Gatwick Airport as a single runway, two terminal airport and growth within its existing footprint, subject to a number of concerns.

Policy GAT2: Safeguarded Land

- **Thames Water** supports the deletion of the Gatwick Airport Safeguarded Land Policy (**Policy GAT2: Safeguarded Land**).

- WSCC recognises the technical work completed on the Crawley Western Link Road and withdraw their objection to **Policy GAT2** and **Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link**. HDC also supports the policy.
- Homes England recognise the national policy drivers for the continued safeguarding area proposed for the potential southern runway of Gatwick Airport and support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within **Policy ST4**, with reference and support for the text of **paragraph 17.29**.
- Homes England supports the wording within supporting text **paragraph 10.18** for the trigger of a Local Plan Review should a change in National Aviation Policy come forward and we will welcome engagement in any future Local Plan Review. However, in the interim, believe that should safeguarding fall away **Policy CL8** should be applied to the Rowley Farm site.
- Landowners in the remaining safeguarded area continue to object to the retention of safeguarding and sterilisation of potential employment sites which could support the diversification of the economy and support the core business function of Manor Royal. One argues that the SA fails to robustly address opportunities to maximise effective use of land or the extent of safeguarding required, rather it prioritises airport growth. Landowners argue safeguarding is based on uncertainty and outdated national policy without robust evidence, and that the government decision to support expansion at Heathrow and the Gatwick Airport Northern Runway proposal remove the need to safeguard land for a further southern runway at Gatwick. Landowners argue reliance on the Masterplan boundary for safeguarding (which now extends further south than the adopted 2015 Local Plan) is not justified, is inappropriate because it is materially different to current proposals for the Northern Runway and is inconsistently applied to unjustifiably exclude the Gatwick Green allocation and land for the Crawley Western Multi-Modal Link. Some landowners argue the remaining safeguarded land east of Balcombe Road could have no role in the delivery of a southern runway and should not be safeguarded. Landowners propose wording changes in the policy or text to allow for temporary uses, and the redevelopment/replacement of existing sites in the safeguarded area.
- Gatwick Green Ltd supports the Strategic Employment Site being removed from the extent of safeguarding and provides evidence, particularly related to car parking provision and highway requirements, to demonstrate the Masterplan safeguarding boundary is not robustly evidenced, and that Gatwick Green can be delivered in a manner that is compatible with the future development of a southern runway. Additional text is proposed for **Policy GAT2** to enable more efficient joint access proposals to be provided.
- GAL continues to support the principle of GAT2 but considers wording from the 2021 version of the Policy should be reinstated to clarify the definition of "small scale" development, and to confirm that GAL does not object to temporary uses which do not prejudice the future delivery of a southern runway. GAL continues to object to the loss of safeguarded of land for the Gatwick Green Strategic Employment allocation and the potential loss for the Crawley Western Relief Road.
- The Sussex Wildlife Trust does not support the expansion of the airport and the impact on biodiversity assets. Together with the Woodland Trust, it lists ancient woodlands which should be excluded from the safeguarded area.
- One respondent put forward that redevelopment of existing commercial sites and temporary uses should be allowed within the safeguarded land (representation made against the Local Plan Map).

<u>Policy GAT3: Gatwick Airport Related Parking</u>

- **National Highways** argue airport parking proposals outside the airport boundary should be accompanied by a detailed Transport Assessment and suggest the passenger mode share targets should reflect the latest targets in the Airport Transport Assessment.
- Support was received from GAL and HDC to **Policy GAT3: Gatwick Airport Related Parking**.
- HX Properties Ltd objections were received to **Policy GAT3**, primarily on the grounds it is ineffective due to GAL's permitted development rights (unless these are removed through

an Article 4), GAL's role in the provision of parking, and the restriction of competition. Suggestions are made regarding data sources, mode share targets and the importance of the involvement of off-airport parking providers in the surface transport discussions.
- The Woodland Trust argued that no areas of ancient woodland should be used for car parking which is not a "wholly exceptional" use.

Policy GAT4: Employment Uses at Gatwick
- GAL continues to support **Policy GAT4: Employment Uses at Gatwick**, as does the owner of Viking House but they argue the policy should be amended to allow for more immediate employment needs rather than being predicated upon long term anticipated airport growth needs.

Crawley Town Centre

Comments on this Chapter were received from five representors. These included a neighbouring local authority, developers, landowners, businesses and infrastructure providers: 90 North Group Limited; Horsham District Council; Chichester College Group; Network Rail; and DT Last Mile Retail (Crawley) Unit Trust.

Comments were received on Policies TC1, TC2, TC3, and TC5.

Policy TC1: Primary Shopping Area & Policy TC2: Town Centre Neighbourhood Facilities
- A modification to **Policies TC1: Primary Shopping Area** and **TC2: Town Centre Neighbourhood Facilities** was suggested, seeking to allocate a specific town centre site for education use.

Policy TC3: Development Sites within the Town Centre Boundary
- Horsham District Council supported the approach of **Policy TC3: Development Sites within the Town Centre Boundary**, welcoming the increased target for residential net completions across the Town Centre Opportunity Sites. HDC requested that the SHLAA provide further detail as to how residential capacities have been identified and demonstrate that site potential has been maximised.
- Specific comments were submitted in relation to identified Town Centre Opportunity Sites, cross referencing to Policies H2 and IN1.

Policy TC5: Town Centre First
- An objection was received in relation to the tighter impact test trigger of 500sqm, considering this to go some way beyond the 2,500sqm threshold identified in the NPPF.

Housing Delivery, Strategic Housing Land Availability Assessment & Housing Trajectory

Comments on this Chapter were received from 39 representors. These included 13 local residents, six neighbouring authorities and parish councils and a county council, infrastructure providers, national government agencies, developers, landowners and businesses, and specific interest groups: National Highways; Sussex Wildlife Trust; Horsham District Council; Mid Sussex District Council; A2 Dominion; Save West of Ifield Campaign; Gladman Developments; Reigate and Banstead Borough Council; Persimmon Homes; Home Builders Federation; CPRE Sussex; Wealden District Council; Chichester District Council; Wates; Network Rail; Slaugham Parish Council; Thames Water; Homes England; Bellway Homes; Woodland Trust; Environment Agency; Natural England; The Bucknall Family; Invia Group; Surrey County Council; and Gatwick Airport Limited.

Comments were received on the Chapter's introductory text, including the Urban Extensions section (paragraphs 12.17-12.23) and unmet housing need as well as Policies H1, H2, H3, H3a, H3b, H3c, H3d, H3e and H3f.

Housing Need (Policy H1)
- Claim that the Strategic Housing Market Assessment (2019) needs updating in order to justify the Housing Need figure in **Policy H1: Housing Provision**.
- Claim that the housing need figure in **Policy H1** should be amended to take account of capacity of neighbouring authorities to accommodate Crawley's unmet need.

- Concern that the approach outlined in **Policy H1** in terms of unmet need is not supported by an up to date Statement of Common Ground with other/neighbouring authorities.
- Concern that strategy in **Policy H1** of only meeting 42% of identified housing need and leaving the rest as unmet need in the expectation that this can be met by neighbouring authorities is not sufficiently justified, given the strain on infrastructure (including the rail network), and the impact of environmental and water neutrality constraints.
- Request for further work to produce a joint evidence base, including a SHLAA, for the Housing Market Area in order to support the approach detailed in **Policy H1**.
- The Save West of Ifield Campaign raised queries in relation to both housing need and housing supply (particularly estate regeneration and densification) evidence.
- General comments about the approach taken in terms of the assessment of housing need, the identification of the proposed housing supply, and the discussion of unmet need.
- General comments and information on the processes taken by neighbouring LPAs and areas in calculating and responding to identified housing need, and the constraints affecting them.
- Concern that the housing supply figure in **Policy H1** is not robust given lack of demonstrated progress with the water neutrality offsetting scheme.
- Request for confirmation that housing growth currently proposed (especially unconsented growth) is similar to the expectations which informed the Transport Study.
- Query as to whether housing target should be reconsidered in light of Written Ministerial Statement of December 2022.
- Concern that the evidence base supporting **Policy H1** (especially the Compact Development Study) does not fully demonstrate that available land has been optimised in terms of housing delivery capacity.
- Query as to why no further work appears to have been undertaken in respect of estate regeneration opportunities as part of the site selection process, notwithstanding the inclusion of **Policy H3a: Estate Regeneration**.
- Request that additional land parcels being promoted within the Forge Wood neighbourhood be identified as part of the borough's housing land supply.
- Concern that mitigation of impacts on level crossings may need to be funded and implemented by developers. Risk assessment should be undertaken for specific applications to determine impact.

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

- Support for recognition that urban extensions may be appropriate, with suggestions of how these could be implemented in a way that accords with the proposed Crawley Local Plan review approach.
- Recommendation that **paragraph 12.23** should be worded more strongly to make Crawley Borough Council support for extensions conditional on requirements being met.
- Homes England consider it is appropriate for Crawley Borough Council to set out its considerations for urban extensions through supporting text, but suggest some modifications to some of the criteria set out in **paragraph 12.23**.
- Concern that **paragraphs 12.17-12.23** relate to areas outside Crawley's administrative area and include a 'shadow' policy. This section should be removed as it is not effective. Also concern regarding apparent expectation that urban extensions will meet need arising from Crawley.
- Concern that **paragraph 12.39** (part of the **Reasoned Justification of Policy H1**) does not recognise the difficulties Horsham District Council has in meeting its own need and should be amended.
- Query as to whether the Local Plan is consistent with installation of cycle/pedestrian paths across Ifield Brook Meadows to provide links to the proposed West of Ifield site.

Appropriate cycle routes should be in place across Ifield and adjacent areas before development takes place.

- Concern that western multi-modal link road should be implemented ahead of West of Ifield but it does not seem plausible given the constraints so there is risk of the traffic affecting existing roads within the borough.

Site Allocations (Policy H2)

- Request that additional land parcels being promoted within the Forge Wood neighbourhood be identified as part of the borough's housing land supply and included in **Policy H2: Key Housing Sites**.
- Recommendation that **Policy H2** should make reference to any site specific sewerage/wastewater infrastructure concerns. Forge Wood Phase 4B and Gatwick Green are likely to require upgrades to the wastewater network and the developers/LPA should liaise with Thames Water regarding this.
- Concern that sites proposed for allocation in **Policy H2** falling within the Sussex North Water Resource Zone should only be permitted on a 'water neutral' basis
- Support for the approach taken by **Policy H2** in respect of treatment of flood risk.
- For consistency with Department for Transport Circular 1/2022, **Policy H2** should require preparation of a vision for each site reflecting community input, supporting sustainable transport, and reducing the need to reduce travel, especially by car. This can be supported through layout and design.
- Further evidence is required to show how the capacities of residential sites in **Policy H2** have been optimised and to thereby justify the overall number of dwellings proposed. This should be more clearly reflected in the SHLAA.
- Support for allocation in **Policy H2** of **Land Adjacent to Sutherland House**, which could come forward sooner and with a larger dwelling quantum than indicated in the Local Plan/SHLAA/housing trajectory. The site should be considered as 'deliverable' and part of the 5-year housing land supply.
- Request that the inclusion of the **car park at Crawley Station** within the **Town Centre Key Opportunity Sites** allocation in **Policy H2**, and any resulting loss of parking provision, will not negatively impact on the accessibility of the station for those who need to travel by car. Request that where new development is proposed close to the station (within the Town Centre Opportunity Site) the council should consider securing improvements to the station to accommodate increased use.
- Concern that the proposed requirement in **Policy H2** for the **Tinsley Lane Playing Fields 'Housing and Open space' site** to provide allotments would jeopardise the delivery of the site, and should be removed/changed.
- Support for elements of **Tinsley Lane Playing Fields allocation** in **Policy H2** which require minimisation of potential conflicts with the function of the adjacent goods yard (a safeguarded minerals site). Inclusion of goods yard minerals site on the Local Plan map is also supported.
- Objections to proposed allocation of **Tinsley Lane Playing Fields** in **Policy H2** as a '**Housing and Open Space' site** on grounds of highways impact/road safety, loss of sport/recreation facilities, lack of provision of community services/facilities, loss of verges on Birch Lea, biodiversity impact, air quality impact, impact on existing character, loss of trees, noise, water neutrality constraints, land contamination, impact on amenity of existing residents, lack of consideration of access needs of users, inability to meet service/operational requirements (e.g. parking, servicing, waste collection), and unsuitable design/layout of proposed plan. Requests that the land should be designated for recreational/sports use in order to meet need for such spaces and facilities.
- Confirmation that the '**Housing, Biodiversity and Heritage site**' at **Land East of Street Hill** is suitable, available and achievable, subject to adoption of a Development Brief, and the allocation in **Policy H2** is supported in principle. However, a proposed change to one

of the allocation criteria, relating to grassland, is not supported as it would not be effective or consistent with national policy.

- Objection to allocation of '**Housing, Biodiversity and Heritage site**' at **Land East of Street Hill** owing to ecological sensitivity of the site as a Local Wildlife Site and its role within wider ecological networks
- Request that the reference to the **Steers Lane** site in **Policy H2** should be changed to take account of Phase 2 and the additional dwellings expected to be delivered there.
- Support for identification of **138-144 London Road** as a **Broad Location** in **Policy H2** as a means of maximising use of an under-occupied site in an accessible location.
- Emphasis that housing allocations in proximity to ancient woodland and/or veteran trees should ensure that impacts on these habitats are avoided and enhancements are supported.
- Objection to allocation for housing development of sites that include areas of ancient semi-natural woodlands.
- Other comments acknowledging terms of the policy in relation to particular sites.

Housing Typologies (Policies H3, H3a-f)

- General support for the '**Housing Typology' policies H3 & H3a-H3f** as striking an appropriate balance between constraints and the imperative to address housing needs as far as possible, although concern is expressed that **Policy H3a: Estate Regeneration** is not justified or optimally effective given apparent lack of progress in identifying estate regeneration opportunities. Also, query as to why recognition of the need to plan for suitable waste and recycling storage within these policies is not accompanied by requirements in respect of treatment of waste associated with development activity.
- Surrey County Council support housing Policies H3c and H3e for previous noted reason.

Strategic Housing Land Availability Assessment

- Request for further work to produce a joint evidence base, including a SHLAA, for the Housing Market Area in order to support the approach detailed in **Policy H1**.
- Further evidence is required to show how the capacities of residential sites in **Policy H2: Key Housing Sites** have been optimised and to thereby justify the overall number of dwellings proposed. This should be more clearly reflected in the SHLAA.
- Approach to considering suitability of residential sites from the perspective of flood risk is broadly supported.
- Support for allocation of **Land Adjacent to Sutherland House**, which could come forward sooner and with a larger dwelling quantum than indicated in the Local Plan/SHLAA/housing trajectory. The site should be considered as 'deliverable' and part of the 5-year housing land supply.
- Objections that **Tinsley Lane Playing Fields Site** is unsuitable for housing development on grounds of highways impact/road safety, loss of sport/recreation facilities, lack of provision of community services/facilities, loss of verges on Birch Lea, biodiversity impact, air quality impact, impact on existing character, loss of trees, noise, water neutrality constraints, land contamination, impact on amenity of existing residents, lack of consideration of access needs of users, inability to meet service/operational requirements (e.g. parking, servicing, waste collection), and unsuitable design/layout of proposed plan.
- If allocated, **Tinsley Lane Playing Fields** should go ahead with a lower dwelling quantum to allow Oakwood Football club to meet its needs.
- Confirmation that the '**Housing, Biodiversity and Heritage site'** at **Land East of Street Hill** is suitable, available and achievable, subject to adoption of a Development Brief.
- Objection to allocation of '**Housing, Biodiversity and Heritage site'** at **Land East of Street Hill** owing to ecological sensitivity of the site as a Local Wildlife Site and its role within wider ecological networks.

- Request that additional land parcels being promoted within the **Forge Wood neighbourhood** be identified as part of the borough's housing land supply.
- Request that the reference to the **Steers Lane** site in **Policy H2** should be changed to take account of Phase 2 and the additional dwellings expected to be delivered there.
- Support for identification of **138-144 London Road** as a **Broad Location** in **Policy H2** as a means of maximising use of an under-occupied site in an accessible location.

Meeting Housing Needs

Comments on this Chapter were received from eight representors. These included a neighbouring authority, a national government agency, landowners, developers and planning agents, businesses and specific interest groups: Oxford Match Ltd.; The Planning Bureau; Muller Property Group; Horsham District Council; Homes England; Gatwick Airport Limited; Natural England; and Heine Planning Consultancy.

Comments were received on Policies H4, H5 and H8.

- Concern that it may not be appropriate, viable or commercially attractive to provide 3-bed properties in town centre locations, as sought by **Policy H4: Future Housing Mix**, and that the 'housing mix test' in the policy is overly prescriptive and potentially in conflict with statement in **paragraph 13.16** that 'family accommodation ... may not necessarily be suitable for all sites'. Policy should be amended to be more flexible.
- Recommendation that specialist older persons housing including sheltered and extra care accommodation should not be required to provide an affordable housing contribution under **Policy H5: Affordable Housing**, reflecting viability issues.
- Concern that the proposed requirement within **Policy H5** for care homes to provide 'affordable care' will make delivery of care homes unviable, even though there is a clear need for this kind of development. The way in which the requirement is set out is overly prescriptive.
- Acknowledgement of the specific provisions within **Policy H5: Affordable Housing** relating to the Town Centre and that the policy identifies circumstances where a commuted payment towards offsite delivery may be more appropriate.
- Concern that Gypsy, Traveller and Travelling Showpeople need is not appropriately assessed for the purposes of **Policy H8: Gypsy, Traveller and Travelling Showpeople Sites**. There is an over-reliance on a reserve site that does not appear to be deliverable and would fail to address existing need; a lack of evidence of effort to identify new sites; and the criteria are not reasonable, fair and potentially offend legal requirements. Request that the GTAA be updated and made more robust.
- Request that the reserve Broadfield Kennels site allocated in **Policy H8** be available to meet need arising elsewhere in the Housing Market Area.
- Support of provisions within **Policy H8** which support the High Weald AONB Action Plan; confirmation that delivery of the site will need to be on a 'water neutral' basis; previous concerns regarding this policy arising from earlier proposals to review safeguarding are now overcome by the proposed reinstatement of **GAT2**.

Green Infrastructure & Biodiversity

Comments on this Chapter were received from nine representors. These included a national government agency, landowners, developers and planning agents and specific interest groups: Natural England; Gatwick Green Limited; Woodland Trust; Sussex Wildlife Trust; Save West of Ifield Campaign; Homes England; The Planning Bureau; Manor Royal BID; and AITUP.

Comments were received on general matters regarding the Environment Act as well as Policies GI1, GI2, GI3 and GI4.

<u>Green Infrastructure</u>

- **Policy GI1: Green Infrastructure** received comments supporting reference to blue/green infrastructure protection and provision.
- Natural England provided support for **Policy GI1** as being consistent with national policy. Comments included ways to strengthen **Policy GI1**, including reference Natural

England's Green Infrastructure (GI) Framework and in particular, the updating of 'Accessible Natural Green Space Standards' (ANGSt) to Accessible Greenspace Standards and furthering the blue/green infrastructure network list and in the supportive text.

Biodiversity Sites

- Support was received for **Policy GI2: Biodiversity Sites** and the requirements to address biodiversity being consistent with national policy.
- Strong support was provided by Sussex Wildlife Trust for the inclusion of **Policy GI2**.
- The Woodland Trust supports the policy to prevent the loss of biodiversity and mitigate against any loss. Welcomes the recognition and guidance made for ancient wood pasture, historic parkland and unique value of ancient woodland.
- Natural England supports **Policy GI2** requirements for the protection of international/ nationally designated sites and irreplaceable habitats and being in line with the NPPF and various goals and actions of the EIP.
- A request for clarity in **Policy GI2** regarding development in Local Wildlife Sites.

Biodiversity and Net Gain

- Support for **Policy GI3: Biodiversity and Net Gain**, confirming that the policy provides appropriate and proportionate requirements for achieving biodiversity and net gain. Comments also support that it is in line with national policy.
- Sussex Wildlife Trust supports **Policy GI3** being in line with the NPPF and Environment Act 2021. However, suggest some policy wording changes could be made to be clearer on the delivery of Biodiversity Net Gain and the Urban Greening Factor.
- The Woodland Trust welcomes the inclusion of one new tree or equivalent soft landscaping for each new dwelling. Also welcomes the guidance for replacement trees not counting towards Biodiversity Net Gain, use of UK tree stock and that landscaping schemes should be agreed by the council.
- Natural England welcome achieving 10% Biodiversity Net Gain and wording relating to Nature Recovery Networks and Local Nature Recovery Strategy. Natural England have provided recommendation to further support the policy.
- Concerns with the approach taken in **Policy GI3**, suggesting that the policy has gone beyond the Environment Act and has applied a sequential approach. Recommends that **Policy GI3** should just refer to the Biodiversity metric and the Environment Act. Concerns raised with the expectation to increase tree cover, particularly on previously developed sites in urban areas.
- Homes England support **Policy GI3** but suggest the January 2020 baseline date is not justified and suggest some modifications to the policy wording.
- Support for the **Policy GI3** reflecting mandatory 10% biodiversity net gain enforced through the Environment Act 2021.
- Manor Royal BID requests applicants are informed about the Manor Royal Biodiversity Net Gain Plan.

Local Green Space

- Homes England supports **Policy GI4: Local Green Space** but proposes modifications to the policy wording.
- Support has been received from the Sussex Wildlife Trust for the inclusion of **Policy GI4**.
- Natural England supports the increased designation of Local Green Space in line with the NPPF and the aims of the EIP focused on creating and improving access to green space.

Sustainable Design & Construction

Comments on this Chapter were received from 15 representors. These included a local resident, a national government agency, neighbouring authorities, landowners, developers and planning agents and specific interest groups: Natural England, The Planning Bureau; AITUP; Manor Royal BID; local resident; Environment Agency; CPRE Sussex; Gladman Developments; Horsham District Council; Ardmore Ltd.; Persimmon Homes; Sussex Wildlife

Trust; Home Builders Federation; Save West of Ifield Campaign; and Chichester District Council.

Comments were received on Policies SDC1, SDC3 and SDC4.

SDC1: Sustainable Design & Construction

- Natural England outlined its support for the policy requirements concerning climate change mitigation and adaption. A further representation also supported **SDC1**, considering it to appropriately support low carbon, energy efficient and sustainable development.
- A further representation considered the policy approach to be commendable, though advocated that it should largely be deleted with the council instead relying on the 2021 Building Regulations and Future Homes Standards.
- Manor Royal BID requests the council make applicants aware of the ReEnergise Manor Royal project.

Policy SDC3: Tackling Water Stress

- General support was expressed for the policy approach. Natural England supported the policy approach, though advised that wording could be strengthened to encourage application of more ambitious water efficiency standards and make clearer that 110l/p/d is the maximum rate. Environment Agency advised that further clarification should be provided as to how 'good' status for water bodies will be ensured. CPRE Sussex advised that the policy text should more explicitly acknowledge uncertainty regarding water supply over the Plan period.

Policy SDC4: Water Neutrality

- Representations were generally supportive of the policy approach.
- Natural England supported the policy approach, considering it sufficient to rule out an adverse effect on the integrity of protected Arun Valley sites, though suggested some modifications to the policy wording and supporting text to improve its robustness.
- Horsham District Council and Chichester District Council outlined strong support for the policy approach and continued joint working between the Local Authorities to comply with water neutrality requirements.
- Representations from wildlife organisations, whilst supportive, considered that the policy should be clearer that offsetting would need to be in place prior to the occupation of development, and suggested modifications to this effect. A further representation questioned whether the policy text sufficiently captures all forms of development that are subject to water neutrality, for example swimming pools.
- Development industry representatives welcomed the councils' efforts to address water neutrality through joint working, though expressed frustration that developers, rather than Southern Water, are being asked to address this issue. Some textual modifications were suggested, including wording that would enable adaptation should water neutrality no longer be required at a future point within the Plan period. One representation questioned whether the Local Plan viability work has fully considered cost implications for developers, considering that Local Plan progression should be delayed until the Local Authority-led offsetting scheme is in place. The need for timely progression of the offsetting scheme was reiterated.

Environmental Protection & Noise Annex

Comments on this Chapter were received from nine representors. These included a national government agency, utilities providers, landowners, developers and planning agents and businesses and specific interest groups: Thames Water; Gatwick Green; Environment Agency; National Highways; Gatwick Airport Limited; Homes England; Bellway Homes; Persimmon Homes; Save West of Ifield Campaign; and Natural England.

Comments were received on the Noise Annex from one representor: Bellway Homes.

Comments were received on Policies EP1, EP2, EP4, EP5 and EP6 and the Noise Annex.

Policy EP1: Development and Flood Risk & Policy EC2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions

- The Environment Agency outlined support for the approach of EP1 and EP2, considering these to represent an appropriate approach to managing flood risk. It welcomed changes made to policies and supporting text, bringing the Local Plan into line with the updated PPG (August 2022). The EA advised that the 2020 SFRA remains fit for purpose, though advise that consideration is given to updating it when new or revised information become available.
- Thames Water and Gatwick Green Limited also outlined support for Policy EP1.

Policy EP4: Development and Noise and Noise Annex

- Gatwick Airport Limited, whilst welcoming amendments made to the policy following previous representations, reiterated previous concerns relating to identification of the 60dB LAeq contour as the threshold for 'unacceptable' noise levels. GAL welcomed the addition of text relating to possible updates to the Gatwick Airport noise contours.
- Development industry representatives objected to the **Policy EP4** approach, outlining concern that the identification of the 'unacceptable' noise level based on thresholds and using external noise levels does not allow for mitigation that reduce noise impacts for habitable areas. Suggested modifications included reinstatement of the 66dB LAeq contour as the threshold for 'unacceptable' noise (as per the adopted 2015 Local Plan). Another representation considered that noise metrics for the 'unacceptable' noise level should be deleted entirely.
- A further representation considered that the health impacts of noise from the construction phase of development should be monitored.

Policy EP5: Air Quality

- Natural England outlined its support for this policy. A separate representation noted that the policy lacks detail on how the health impacts of air quality will be monitored.

Policy EP6: External Lighting

- National Highways set out that the policy should include a requirement for the assessment of brightness impacts where external lighting is proposed in close proximity to the strategic road network.

Sustainable Transport, Transport Modelling & Parking Standard Annex

Comments on this Chapter were received from 15 representors. These included a neighbouring local authority, national government agencies, the county councils, landowners, developers and planning agents, businesses and specific interest groups: Save West of Ifield Campaign; Surrey County Council; National Highways; Gatwick Green Ltd.; Gatwick Airport Limited; Homes England; West Sussex County Council; Horsham District Council; Ardmore Ltd.; The Barker Trust; Sussex Wildlife Trust; Woodland Trust; BYM Capital; Manor Royal BID; and AITUP.

Comments were received on the Parking Standards Annex from one representor: West Sussex County Council.

Comments were received on the Chapter and the approach to Transport Modelling in general as well as specific Policies ST1, ST2, ST3 and ST4 and the Parking Standards Annex.

- Expressions for support for the general approach of **Policy ST1: Development and Requirements for Sustainable Transport**.
- National Highways recommend that **Policy ST1** be amended to more strongly reflect 'vision and validate' approach in relation to management of demand for travel and transport impacts.
- Gatwick Airport Limited recommend that **Policy ST1** could be strengthened by being more explicit about need to need to consider impacts on major infrastructure such as Gatwick Airport as part of Transport Assessment - as previously recommended.

- Gatwick Green Ltd (The Wilky Group) provide commentary highlighting the consistency of the approach detailed in **Policy ST1** with the proposed Gatwick Green allocation included in **Policy EC4**.
- Concern that **Policy ST1** fails to include requirement for new cycling infrastructure within the borough to be provided by new developments coming forward on Crawley's boundaries. Need to acknowledge extent to which active travel/public transport infrastructure must be improved in order for non-car options to be genuinely prioritised.
- Manor Royal BID request to be engaged in supporting applicants to prepare travel plans and provision of EV charging.
- Gatwick Airport Limited no longer object to **Policy ST3: Improving Rail Stations**, as amended. Homes England continue to support **Policy ST3**.
- National Highways consider that based on current information **Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link** will not have an unacceptable impact on the Strategic Road Network.
- Some expression of support for the general approach of **Policy ST4**.
- West Sussex County Council withdraws its objection to **Policy ST4** following further work on the proposed area of search.
- Horsham District Council acknowledge joint working in respect of **Policy ST4** and support the policy subject to need for joint agreement on corridor.
- Homes England support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within Policy ST4, with reference and support for the text of paragraph 17.29. Homes England support the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the Western Multi-Modal Transport Link as a strategic transport link. Homes England suggest some policy wording in order to support the deliverability of the scheme.
- Objection that search corridor identified in **Policy ST4** encroaches into the safeguarded area and is therefore in conflict with **Policy GAT2** and the requirement to safeguard land for a potential wide-spaced southern runway.
- Objection that **Policy ST4** is not effective, justified, or sound, given its relationship with **Policy GAT2** and other policies.
- Objections/concerns regarding the proposed area of search in **Policy ST4** on basis of its impact on nearby opportunities for delivery of employment-related development. An alternative area with a different alignment forming part of the Jersey Farm masterplan is put forward as being preferable.
- Proposed amendments to **Policy ST4** to strengthen consideration of impact on biodiversity sites.
- Acknowledgement of potential suitability of the Western Multi-Modal Transport Link as a potential means of mitigating impact of Gatwick DCO proposals.
- Query as to whether the Western Multi-Modal Transport Link is the right approach given impact on heritage, character, setting of the borough, noise, biodiversity, and air pollution.
- Concern is raised by BYM Capital where the Area of Search for the Crawley Western Multi-Modal Transport Link Corridor includes land within their ownership.
- Manor Royal BID questions the extent of the Area of Search to the east.

<u>Transport Modelling</u>

- National Highways express concern that the Local Plan falls short of meeting the 'justified' soundness test because the Crawley Transport Study does not make proportionate allowance for the scale of development which could come forward in the later part of the Local Plan period, and the forecast year given in the Study (2035) falls five years before the Local Plan end date (2040).

- Requests for sensitivity testing of impact of Gatwick Airport Northern Runway DCO proposals.

Parking Standards Annex

- Recommendation that the Annex be updated to reflect fact that there is now national guidance regarding provision of electric vehicle charging infrastructure.

Duty to Cooperate

Comments relating to the Duty to Cooperate were received from two representors as part of the Regulation 19 Consultation on the Local Plan (in addition to representations made on unmet needs which have been covered in the Housing Needs Chapter and directly in relation to the Duty to Cooperate Statement): National Highways; and Homes England.

- National Highways reiterated its view that the Local Plan is legally compliant in respect of the Duty to Cooperate. This representation confirmed CBC has engaged constructively, actively and on an ongoing basis on strategic planning matters relating to the SRN during the preparation of the Local Plan.
- Homes England believes that without a signed Statement of Common Ground between Crawley and remaining authorities, in particular Horsham District Council, the Local Plan cannot be considered legally compliant or sound.

Sustainability Appraisal/Strategic Environmental Assessment

Comments on the Sustainability Appraisal/Strategic Environmental Assessment were received from seven representors: HX Properties Ltd.; Gatwick Green Limited; Reigate and Banstead Borough Council; Historic England; Environment Agency; Natural England; and a local resident.

- HX Properties Ltd raises various objections to the SA/SEA. In relation to the assessments of Policy EC7 (hotel and visitor accommodation) they consider that further options should have been assessed. In relation to Policy GAT3, the representation considers that Policy GAT3 should be re-appraised, with a further option considered.
- Gatwick Green Limited considers the SA/SEA to be legally compliant and supports its findings in relation to Policies EC1, EC4, ST1, IN1, and GAT2.
- Reigate and Banstead Borough Council has withdrawn its previous written concerns on legal compliance (Policy EC1).
- Historic England is content that the SA report for the Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.
- Environment Agency welcomed recognition in the SA/SEA regarding the managing of flood risk in the borough.
- A respondent noted that in relation to Policy SDC1, reference should be made to the minimum BREEAM standard and the use of the Passiv Haus standard.

Local Plan Map

Comments on the Local Plan Map were received from four representors: Save West of Ifield Campaign; a local resident; Ardmore Ltd. and Arora Management Services.

- **Heritage:** Noted that list of heritage assets under Policy HA1 does not include village greens. A resident response sought amendment of the Hazelwick Road Conservation Area boundary.
- **Gatwick Airport:** Arora Group has objected to the removal of Schlumberger House from the Gatwick Airport boundary.
- Vail Williams (on behalf of Ardmore Ltd) requested that the **Built Up Area Boundary** should be realigned, considering that a Crawley Western Multi-Modal Transport Link

would fundamentally change the character and setting of the Upper Mole Farmlands Rural Fringe.

Habitats Regulations Assessment

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

- Natural England concur with the conclusions of the HRA and appropriate assessment, considering that the Local Plan will have no adverse effects on the integrity of internationally designated sites, either alone or in-combination.
- Reigate and Banstead Borough Council welcomed the updated Habitats Regulation Report (January 2023) and its conclusion of No Adverse Impact On Site Integrity (alone or in combination) on the Mole Gap to Reigate Escarpment in relation to Nitrogen depositions concentrations and water.
- Mid Sussex District Council welcomes preparation of the HRA.

Viability Assessment & Planning Obligations Annex

Comments relating to the Viability Assessment and Planning Obligations Annex were received from five representors: Gladman Developments; West Sussex County Council; The Planning Bureau Ltd.; Gatwick Green Ltd.; and Network Rail.

<u>Planning Obligations Annex</u>

- The Annex should take account of the likelihood that mitigation of impacts of development on level crossings may need to be funded and implemented - at no cost to Network Rail. Risk assessment should be undertaken for individual applications to determine impact.
- The wording of the annex should be amended to clarify that requirement for skills contribution/support could in some circumstances be satisfied on site/in kind.
- Comments regarding anticipated funding needs for additional General Practice capacity.
- Further commentary noting approach set out in the Annex.

<u>Viability Assessment</u>

- Figure of £2,000 per dwelling used in the Viability Assessment to reflect the costs of meeting Water Neutrality requirements does not sufficiently reflect estimated cost of higher-cost approaches as reflected in the Topic Paper - i.e. greywater recycling.
- The Viability Assessment should be updated to take account of previous representations made in relation to costs of providing older persons' accommodation and extra care housing.
- Acknowledgement that Viability Assessment has been amended in response to previous comments in order to clarify that S106 contributions could in some circumstances be sought for Education and other infrastructure.

5.24 No comments were received in relation to the Local Development Scheme and Statement of Community Consultation or any other Key Document or evidence base document (other than as mentioned as part of representations made to specific policies or sections in the Local Plan captured above).

6. Combined Regulation 19 Consultations Representations Summary

Total Number of Representations Received

6.1 During the three separate Regulation 19 Publication Consultations carried out on the Crawley Borough Local Plan Review (2020, 2021 and 2023) around 950 individual representations were received to the Local Plan, its policies and the other Key Documents.

6.2 Over 50 representations were made in support to the Local Plan and/or individual policies.

6.3 50 representations were made in relation to legal compliance on the Duty to Cooperate, Sustainability Appraisal/Strategic Environmental Appraisal, Habitats Regulations Assessment, Statement of Community Involvement and the Local Development Scheme.

Representors

6.4 Representations were made by a total of 158 discrete representors. Most of these submitted representations to more than one Publication Consultation.

6.5 Representations were made by 12 statutory consultees/government departments and agencies, county councils and infrastructure providers:

- Crawley CCG (2020)/NHS Sussex ICB (2023)
- Department for Education (2020)
- Environment Agency (2020; 2023)
- Highways England/National Highways (2020; 2021; & 2023)
- Historic England (2020; 2023)
- Natural England (2020; 2021; & 2023)
- Network Rail (2023)
- Southern Water (2020)
- Sport England (2020; & 2023)
- Surrey County Council (2020; & 2023)
- Thames Water (2020; & 2023)
- West Sussex County Council (2020; 2021; & 2023)

6.6 In addition, 12 Local Authorities and Town and Parish Councils submitted comments on the Local Plan and its supporting documents:

- Arun District Council (2020)
- Chichester District Council (2021; & 2023)
- Horley Town Council (2021; & 2023)
- Horsham District Council (2020; 2021; & 2023)
- Mid Sussex District Council (2020; 2021; & 2023)
- Mole Valley District Council (2020)
- Reigate and Banstead Borough Council (2020; 2021; & 2023)
- Rusper Parish Council (2021)
- Slaugham Parish Council (2023)
- Tandridge District Council (2020)
- Waverley District Council (2020; & 2021)
- Wealden District Council (2023)

6.7 50 representors from a range of planning consultants, landowners and developers submitted comments on the Local Plan and its supporting documents, over the three Publication Consultations:

- Danescroft (RLP Crawley) (2020; & 2021)
- WSCC Property Assets (2020; & 2021)
- Wilky Group/Gatwick Green Ltd. (2020; 2021; & 2023)
- Gladman Development Ltd. (2020; 2021; & 2023)
- St. Catherine's Hospice (2020; & 2021)
- The Bucknall Family (2020; 2021; & 2023)
- Rainier Developments Ltd. (2020)
- WT Lamb Properties, the Dye Family and Elliot Metals/the Simmonds Family (2020; 2021; & 2023)
- Legal & General (2020)
- Surrey County Council (2020)
- Ardmore Ltd. & Consortium (2020; 2021; & 2023)
- UK Commercial Property Finance Holdings Limited (2020)
- Sky Gem Properties Ltd. (2020)
- Tetlow King Planning (2020)
- HX Properties Ltd. (2020; 2021; & 2023)
- Aggregate Industries UK Ltd. Cemex UK Operations Ltd. Day Group Ltd. and Brett Group (2020; & 2023)
- Homes England (2020; 2021; & 2023)
- Caravan Motorhome Club (2020)
- Rentplus UK Ltd. (2020)
- Barker Trust (2020; 2021; & 2023)
- Habinteg (2020)
- Gatwick Airport Limited (2020; 2021; & 2023)
- Universities Superannuation Scheme Ltd. (2020; & 2023)
- Bellway Homes (2020; & 2023)
- Persimmon (2020; 2021; & 2023)
- NHS Property Services (2020)
- Fernhill Riding School (2021)
- CMA Planning Ltd. (2021)
- COIF Nominees Ltd. (2021)
- TS Leisure & Property (2021)
- Landlord (2021)
- Southern Gas Network (2021)
- A2 Dominion Group (2021; & 2023)
- Inspired Villages (2021)
- The Sogno Family Trust (2021)
- Vectos (JLL) (2021)
- Arora Management Services Ltd. (2021; & 2023)
- Oxford Match Limited (2021; & 2023)
- The Planning Bureau (2021; & 2023)
- Heine Planning Consultancy (2023)
- BYM Capital (2023)
- Panattoni UK (2023)
- 90 North Group Limited (2023)
- AIPUT (2023)

- Wates (2023)
- Chichester College Group (2023)
- Invia Group Ltd. (2023)
- DT Last Mile Retail (Crawley) Unit Trust (2023)
- Muller Property Group (2023)

6.8 14 expert and lobby groups submitted representations during the three Publication Consultations:

- Gatwick's Big Enough (2020)
- Home Builders Federation (2020; 2021; & 2023)
- The Ifield Society (2020; & 2023)
- Crawley Green Party (2020)
- CAGNE (2020; & 2021)
- Sussex Ornithological Society (2020; 2021; & 2023)
- Gatwick Area Conservation Campaign (2020; 2021)
- Ifield Village Conservation Area Advisory Committee (2020; & 2021)
- Sussex Wildlife Trust (2020; 2021; & 2023)
- Woodland Trust (2021; & 2023)
- Radford Road Community Ltd. (2021)
- Crawley Town Centre Bid Board (2021)
- Save West of Ifield Campaign (2023)
- CPRE Sussex (2023)

6.9 Representations were made by 67 local residents over the three Publication Consultations. Out of these, only four residents submitted comments to more than one of the consultations. Most local resident representations were made to specific individual site allocation proposals and in relation to proposed strategic development outside of Crawley's administrative boundaries. Representations were made in relation to:

- Strategic Employment Location – Gatwick Green, Policy EC4 (21 local residents and a Community Group in 2021, and one repeated representor in 2023)
- Housing and Open Space Site – Henty Close, Bewbush, Policy H2 (7 local residents, 2021, site no longer allocated in Policy H2)
- Housing and Open Space Site – Rushetts Road Play Area, Policy H2 (1 local resident, 2021, site no longer allocated in Policy H2)
- Housing, Biodiversity and Heritage Site – Balcombe Road/Street Hill, Worth, Policy H2 (1 local resident, 2021)
- Broad Locations, Policy H2 (1 local resident, 2021)
- Housing and Open Space Site – Tinsley Lane, Three Bridges, Policy H2 (10 local residents, 2023)
- Area of Search for a Crawley Western Multi-Modal Transport Link, Policy ST4 (5 local residents, 2020 & 2021)

Policy Analysis

6.10 Across the three Publication Consultations, five policies didn't receive any comments directly made on them:

- CL5: Significant Development, Masterplanning and Design Success
- EC6: High Quality Office Provision
- EC12: Neighbourhood Centres
- H6: Build to Rent

- H9: Houses in Multiple Occupation

6.11 Three policies only received representations in support:

- EC8: Evening and Night-Time Economy (Crawley Town Centre Bid Board, 2021)
- EC9: supporting the Creative Industries (Crawley Town Centre Bid Board, 2021)
- EC10: Flexible Temporary Art and Creative Uses (Crawley Town Centre Bid Board, 2021)

6.12 Nine policies only received representations from a single representor:

- DD5: Aerodrome Safeguarding (Gatwick Airport Limited, 2020, 2021, 2023)
- DD7: Crossovers (Sussex Wildlife Trust, 2021)
- HA2: Areas of Special Local Character (Ifield Village Conservation Area Advisory Committee, 2020, 2021)
- EC13: Rural Economy (Sussex Wildlife Trust, 2020)
- H3: Housing Typologies (The Planning Bureau, 2021)
- H3a: Housing Typologies: Estate Regeneration (Horsham District Council, 2020, 2021, 2023)
- EP2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions
- EP5: Air Quality (Natural England, 2023)
- EP6: External Lighting (Sussex Wildlife Trust, 2021)

6.13 In addition, a further nine policies received representations from two representors:

- CL1: Neighbourhood Principle (St. Catherine's Hospice, 2020, 2021; Sussex Wildlife Trust, 2020)
- CL9: High Weald Area of Outstanding Natural Beauty (Sussex Ornithological Society, 2023; Natural England, 2021, 2023)
- OS3: Rights of Way and Access to the Countryside (West Sussex County Council, 2021; Natural England, 2021)
- IN3: Supporting High Quality Communications (West Sussex County Council, 2020; Resident 13, 2020)
- EC5: Employment and Skills Development (Ardmore Ltd, 2020; Wilky Group/Gatwick Green Ltd., 2021, 2023)
- TC4: Active and Engaging Frontages (Crawley Town Centre Bid Board, 2021 – support; Oxford Match Limited, 2021)
- H3e: Housing Typologies: Conversions from Commercial/Non-Residential Uses (Surrey County Council, 2020, 2023); Aberdeen Standard Investments in partnership with the Barker Trust, 2021)
- H3f: Housing Typologies: Open Spaces (Horsham District Council, 2020, 2021, 2023; Natural England, 2023)
- EP3: Land and Water Quality (Environment Agency, 2020; Southern Gas Network, 2021)

6.14 The following policies received the most representations:

- SD3: North Crawley Area Action Plan (deleted Policy) – 23 Representations from 18 Representors

- CL8: Development Outside the Built-Up Area – 17 Representations from 13 Representors
- IN1: Infrastructure Provision – 21 Representations from 15 Representors
- EC1: Sustainable Economic Growth – 31 Representations from 19 Representors
- EC2: Economic Growth in Main Employment Areas – 23 Representations from 15 Representors
- EC4: Strategic Employment Location – 48 Representations from 39 Representors
- GAT1: Development of the Airport with a Single Runway – 22 Representations from 17 Representors
- GAT2: Safeguarded Land – 25 Representations from 19 Representors
- GAT3: Gatwick Airport Related Parking – 15 Representations from 10 Representors
- H1: Housing Provision – 42 Representations from 31 Representors
- H2: Key Housing Sites – 64 Representations from 47 Representors (Henty Close – 7 Representors; Tinsley Lane – at least 6 Representors
- H36: Housing Typologies: Urban Extensions (deleted Policy, now paragraphs 12.17-12.23) – 21 Representations from 14 Representors.
- GI1: Green Infrastructure – 12 Representations from 8 Representors
- GI2: Biodiversity Sites – 20 Representations from 12 Representors
- GI3: Biodiversity Net Gain – 23 Representations from 16 Representors
- SDC1: Sustainable Design and Construction – 12 Representations from 9 Representors
- SDC3: Tackling Water Stress – 12 Representations from 8 Representors
- SDC4: Water Neutrality – 11 Representations from 11 Representors
- EP4: Development and Noise – 13 Representations from 8 Representors
- ST1: Development and Requirements for Sustainable Transport – 19 Representations from 10 Representors
- ST4: Area of Search for a Crawley Western Multi-Modal Transport Link – 39 Representations from 25 Representors

6.15 26 representations were made by 15 Representors to the Sustainability Appraisal/Strategic Environmental Assessment.

6.16 The following table sets out the combined details of the representors against the Policies in the Local Plan.

Table 9: Combined Local Plan Policy Representations – Publication Consultations: 2020; 2021; & 2023

	REPRESENTATIONS (S = SUPPORT)	**REPRESENTORS NO.**	**REPRESENTATIONS No.**
Key Diagram	RESIDENT 16 (2021)	1	1
Crawley: A Vision	ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2020) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) ENVIRONMENT AGENCY (2020) SUSSEX WILDLIFE TRUST (2020)	10	12

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		WT LAMB PROPERTIES/DYE FAMILY/ELLIOT METALS/SIMMONDS FAMILY (2020; 2021 – S; 2023 – S) ENVIRONMENT AGENCY (2020) A2 DOMINION GROUP (2021) NATURAL ENGLAND (2023) GATWICK GREEN LTD. (2023) SAVE WEST OF IFIELD CAMPAIGN (2023)		
SD1	Presumption in Favour of Sustainable Development	NATIONAL HIGHWAYS (2020; 2023) ST. CATHERINE'S HOSPICE (2020; 2021) HISTORIC ENGLAND (2020) ENVIRONMENT AGENCY (2020) WOODLAND TRUST (2021; 2023) NATURAL ENGLAND (2021)	6	9
SD2	Enabling Healthy Lifestyles and Wellbeing	RAINIER DEVELOPMENTS LTD (2020) SPORT ENGLAND (S) (2020) WEST SUSSEX COUNTY COUNCIL (2020) RESIDENT 15 (2020) SUSSEX WILDLIFE TRUST (2020; 2021) PERSIMMON (2021) SAVE WEST OF IFIELD CAMPAIGN (2023) NATIONAL HIGHWAYS (2023)	8	9
SD3	Deleted Policy North Crawley AAP	WT LAMB PROPERTIES/DYE FAMILY/ELLIOT METALS/SIMMONDS FAMILY (2020) LEGAL & GENERAL (2020) SPORT ENGLAND (2020) HORSHAM DISTRICT COUNCIL (2020) ARDMORE LTD. & CONSORTIUM (2020; 2021) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) HX PROPERTIES (2020) (S) HOMES ENGLAND (2020) TANDRIDGE DISTRICT COUNCIL (2020) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2020) (S) WILKY GROUP/GATWICK GREEN LTD (2020) (S) GATWICK AIRPORT LIMITED (2020; 2023 S DELETION) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) HISTORIC ENGLAND (2020) MOLE VALLEY DISTRICT COUNCIL (2020) MID SUSSEX DISTRICT COUNCIL (2020; 2021; 2023) SUSSEX WILDLIFE TRUST (2020; 2021) NATURAL ENGLAND (2020)	18	23
CL1	Neighbourhood Principle	ST. CATHERINE'S HOSPICE (2020, 2021) SUSSEX WILDLIFE TRUST (2020)	2	3
CL2	Making Successful Places – Principles of Good Urban Design	RESIDENT 3 (2020) ARDMORE LTD. & CONSORTIUM (2020; 2021) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) HISTORIC ENGLAND (2020) PERSIMMON HOMES PLC (2020)	9	10

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		SUSSEX WILDLIFE TRUST (2020) HX PROPERTIES (2021) THE SOGNO FAMILY TRUST (2021) INVIA GROUP LTD. (2023)		
CL3	Local Character and the Form of New Development (merged principles into other policies CL2-CL5)	ARDMORE LTD. & CONSORTIUM (2020) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) HOMES ENGLAND (2020) HISTORIC ENGLAND (2020) SUSSEX WILDLIFE TRUST (2020) THE SOGNO FAMILY TRUST (2021)	6	6
CL3	Movement Patterns, Layout and Sustainable Urban Design	ST. CATHERINE'S HOSPICE (2020 – WAS CL4; 2021) HORSHAM DISTRICT COUNCIL (2020) – WAS CL4 MID SUSSEX DISTRICT COUNCIL (2020 – WAS CL4; 2021; 2023) ARDMORE LTD. & CONSORTIUM (2020 (SEE ABOVE); 2023) THE SOGNO FAMILY TRUST (2021)	5	9
CL4	Compact Development – Layout, Scale and Appearance	HOME BUILDERS FEDERATION (2020) – WAS CL5 DANESCROFT (RLP CRAWLEY) LLP (2020; 2021) RAINIER DEVELOPMENTS LTD. (2020) – WAS CL5 HORSHAM DISTRICT COUNCIL (2020) – WAS CL5 ARDMORE LTD. & CONSORTIUM (2020) – WAS CL5 MID SUSSEX DISTRICT COUNCIL (2020 – WAS CL5; 2021; 2023) ST CATHERINE'S HOSPICE (2020 – WAS CL5; 2021) CRAWLEY TOWN CENTRE BID BOARD (2021) (S) THE SOGNO FAMILY TRUST (2021) HORSHAM DISTRICT COUNCIL (2021 – WAS CL5; 2023) RESIDENT 53 (2023) INVIA GROUP LTD. (2023)	12	17
CL5	Significant Development, Masterplanning and Design Success		0	0
CL6	Structural Landscaping	WSCC PROPERTY ASSETS (2020; 2021) SKY GEM PROPERTIES LTD. (2020) SUSSEX WILDLIFE TRUST (2020; 2021) MULLER PROPERTY GROUP (2023)	4	6
CL7	Important and Valued Landscape and Views	HORSHAM DISTRICT COUNCIL (2020) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) UNIVERSITIES SUPERANNUATION SCHEME LTD. (2020; 2023) HISTORIC ENGLAND (2020) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021)	6	8

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
CL8	Development Outside the Built-Up Area	ARDMORE LTD. & CONSORTIUM (2020; 2021; 2023) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) HOMES ENGLAND (2020) HISTORIC ENGLAND (2020) SUSSEX WILDLIFE TRUST (2020) MID SUSSEX DISTRICT COUNCIL (2020; 2021; 2023) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021) HX PROPERTIES (2021) COIF NOMINEES LTD. (2021) RESIDENTS (SQUIRES PLANNING) (2021) THE SOGNO FAMILY TRUST (2021) SUSSEX ORNITHOLOGICAL SOCIETY (2023) IFIELD SOCIETY (2023)	13	17
CL9	High Weald Area of Outstanding Natural Beauty	SUSSEX ORNITHOLOGICAL SOCIETY (2023) NATURAL ENGLAND (2021; 2023)	2	3
DD1	Normal Requirements of All New Development	SURREY COUNTY COUNCIL (2020) HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) SURREY COUNTY COUNCIL (2020) HISTORIC ENGLAND (2020) SUSSEX WILDLIFE TRUST (2020; 2021) RESIDENT 10 (2021) WOODLAND TRUST (2021; 2023) NATURAL ENGLAND (2021; 2023) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021) THE PLANNING BUREAU (2021)	10	15
DD2	Inclusive Design	HOME BUILDERS FEDERATION (2020; 2021) GLADMAN DEVELOPMENT LTD (2020; 2021 – S) HABINTEG (2020) INSPIRED VILLAGES (2021) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021)	5	7
DD3	Standards for All New Dwellings (including conversions)	RAINIER DEVELOPMENTS LTD. (2020) OXFORD MATCH LIMITED (2021) THE PLANNING BUREAU (2021; 2023)	3	4
DD4	Tree and Landscape Character Planting (deleted policy)	THAMES WATER (2020) RAINIER DEVELOPMENTS LTD. (2020) RESIDENT 10 (2021)	3	3
DD4	Tree Replacement Standards	THAMES WATER (2020 (S); 2023 (S) RESIDENT 10 (2020) – WAS DD5 RAINIER DEVELOPMENTS LTD. (2020) – WAS DD5 SUSSEX WILDLIFE TRUST (2020) – WAS DD5 WOODLAND TRUST (2021; 2023) THE PLANNING BUREAU (2021; 2023)	7	10

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		NATURAL ENGLAND (2023)		
DD5	Aerodrome Safeguarding	GATWICK AIRPORT LIMITED (2020 – WAS DD6; 2021; 2023)	1	3
DD6	Advertisements	HISTORIC ENGLAND (2020) GATWICK AIRPORT LIMITED (2020 – WAS DD7; 2021; 2023 S) SUSSEX WILDLIFE TRUST (2020) – WAS DD7	3	5
DD7	Crossovers	SUSSEX WILDLIFE TRUST (2021)	1	1
HA1	Heritage Assets	IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2020 – S; 2021) HISTORIC ENGLAND (2020) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) RUSPER PARISH COUNCIL (2021) SAVE WEST OF IFIELD CAMPAIGN (2023)	5	7
HA2	Conservation Areas	ST. CATHERINE'S HOSPICE (2020) HISTORIC ENGLAND (2020) (S) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021)	3	3
HA3	Areas of Special Local Character	IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021)	1	1
HA4	Listed Buildings and Structures	HISTORIC ENGLAND (2020) (S) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021) RESIDENTS (SQUIRES PLANNING) (2021) GATWICK GREEN LTD. (2023)	4	4
HA5	Locally Listed Buildings	IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) RESIDENTS (SQUIRES PLANNING) (2021) CHICHESTER COLLEGE GROUP (2023) MULLER PROPERTY GROUP (2023)	5	6
HA6	Historic Parks and Gardens	IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2020; 2021)	1	2
HA7	Heritage Assets of Archaeological Interest	HISTORIC ENGLAND (2020) (S) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021)	2	2
OS1	Open Space, Sport and Recreation	HORSHAM DISTRICT COUNCIL (2020) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2020) (S) MID SUSSEX DISTRICT COUNCIL (2020) RESIDENT 56 (2023) SAVE WEST OF IFIELD CAMPAIGN (2023)	5	5
OS2	Provision of Open Space and Recreational Facilities	SPORT ENGLAND (2020) SUSSEX WILDLIFE TRUST (2020) WOODLAND TRUST (2021; 2023) THE SOGNO FAMILY TRUST (2021) NATURAL ENGLAND (2023)	5	6
OS3	Rights of Way and Access to the Countryside	WEST SUSSEX COUNTY COUNCIL (2021) NATURAL ENGLAND (2021)	2	2

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
IN1	Infrastructure Provision	RESIDENT 1 (2020) THAMES WATER (2020; 2023) DEPARTMENT FOR EDUCATION (2020) ST. CATHERINE'S HOSPICE (2020; 2021) WT LAMB PROPERTIES/DYE FAMILY/ELLIOT METALS/ SIMMONDS FAMILY (2020) CRAWLEY CCG (2020) (S) GATWICK AIRPORT LIMITED (2020; 2021; 2023 - S) ENVIRONMENT AGENCY (2020) WEST SUSSEX COUNTY COUNCIL (2021; 2023) RESIDENT 39 (2021) SAVE WEST OF IFIELD CAMPAIGN (2023) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) ENVIRONMENT AGENCY (2023) SURREY COUNTY COUNCIL (2023) NETWORK RAIL (2023)	15	21
IN2	The Location and Provision of New Infrastructure	DEPARTMENT FOR EDUCATION (2020) THAMES WATER (2020; 2023) WEST SUSSEX COUNTY COUNCIL (2020 (S); 2023) RESIDENT 15 (2020) GATWICK AIRPORT LIMITED (2020; 2021; 2023 – S) SAVE WEST OF IFIELD CAMPAIGN (2023) NATIONAL HIGHWAYS (2023)	7	11
IN3	Supporting High Quality Communications	WEST SUSSEX COUNTY COUNCIL (2020) RESIDENT 13 (2020)	2	2
EC1	Sustainable Economic Growth	HIGHWAYS ENGLAND/NATIONAL HIGHWAYS (2020; 2023) WEST SUSSEX COUNTY COUNCIL (2020) HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) SURREY COUNTY COUNCIL (2020) ARDMORE LTD. (2020; 2021; 2023) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) AGGREGATE INDUSTRIES UK LTD., CEMEX UK OPERATIONS LTD., DAY GROUP LTD. AND BRETT GROUP (2020) HOMES ENGLAND (2020) BARKER TRUST (2020; 2021; 2023) WILKY GROUP/GATWICK GREEN LTD (2020; 2021; 2023) GATWICK AIRPORT LIMITED (2020; 2021; 2023) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) MOLE VALLEY DISTRICT COUNCIL (2020) MID SUSSEX DISTRICT COUNCIL (2020) RESIDENT 15 (2020) WT LAMB PROPERTIES/DYE FAMILY/ELLIOT METALS/SIMMONDS FAMILY (2021; 2023) HX PROPERTIES (2021) RESIDENTS (SQUIRES PLANNING) (2021) OXFORD MATCH LIMITED (2021; 2023)	19	31
EC2	Economic Growth in Main	SURREY COUNTY COUNCIL (2020) ARDMORE LTD. (2020; 2021; 2023)	14	22

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
	Employment Areas	UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) AGGREGATE INDUSTRIES UK LTD., CEMEX UK OPERATIONS LTD., DAY GROUP LTD. AND BRETT GROUP (2020) GATWICK AIRPORT LIMITED (2020; 2021; 2023) UNIVERSITIES SUPERANNUATION SCHEME LTD. (2020; 2023) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) BELLWAY HOMES (2020) BARKER TRUST (2021; 2023) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) COIF NOMINEES LTD. (2021) ALDI STORES LTD. (2021) OXFORD MATCH LIMITED (2021; 2023)		
EC3	Manor Royal	WEST SUSSEX COUNTY COUNCIL (2020; 2021) SURREY COUNTY COUNCIL (2020) ARDMORE LTD. (2020; 2021; 2023) AGGREGATE INDUSTRIES UK LTD., CEMEX UK OPERATIONS LTD., DAY GROUP LTD. AND BRETT GROUP (2020) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) HX PROPERTIES (2021) BARKER TRUST (2021; 2023) COIF NOMINEES LTD. (2021)	8	12
EC4	Strategic Employment Location	WT LAMB PROPERTIES/DYE FAMILY/ELLIOT METALS/SIMMONDS FAMILY (2021; 2023) ARDMORE LTD. (2021; 2023) BARKER TRUST (2021; 2023) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) GATWICK AIRPORT LIMITED (2021; 2023) REIGATE AND BANSTEAD BOROUGH COUNCIL (2021; 2023) MID SUSSEX DISTRICT COUNCIL (2021; 2023) RESIDENT 17 (2021) RESIDENT 18 (2021) RESIDENT 19 (2021) RESIDENT 20 (2021) RESIDENT 21 (2021) RESIDENT 22 (2021) FERNHILL RIDING SCHOOL (2021) RESIDENT (CMA PLANNING LTD) (2021) RESIDENT 24 (2021) RESIDENT 25 (2021) RESIDENT 26 (2021) RESIDENT 28 (2021) RESIDENT 29 (2021) RESIDENT 30 (2021) RESIDENT 31 (2021)	39	48

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		RADFORD ROAD COMMUNITY LTD (2021) TS LEISURE AND PROPERTY (2021) RESIDENT 32 (2021) LANDLORD 1 (2021) RESIDENT 33 (2021) RESIDENT 34 (2021) RESIDENT 36 (2021) HORLEY TOWN COUNCIL (2021; 2023) RESIDENT 37 (2021; 2023) RESIDENT 45 (2021) RESIDENTS (SQUIRES PLANNING) (2021) VECTOS (2021) RESIDENT 50 (2021) RESIDENT 51 (2021) NATURAL ENGLAND (2023) SURREY COUNTY COUNCIL (2023) NATIONAL HIGHWAYS (2023)		
EC5	Employment and Skills Development	ARDMORE LTD. (2020) – WAS EC4 WILKY GROUP/GATWICK GREEN LTD. (2021; 2023)	2	3
EC6	High Quality Office Provision		0	0
EC7	Hotel and Visitor Accommodation	HX PROPERTIES (2020 – WAS EC6; 2021) CARAVAN MOTORHOME CLUB (2020) – WAS EC6 GATWICK AIRPORT LIMITED (2020 – WAS EC6; 2021; 2023 S)	3	6
EC8	Evening and Night-Time Economy	CRAWLEY TOWN CENTRE BID BOARD (2021) (S)	1	1
EC9	Supporting the Creative Industries	CRAWLEY TOWN CENTRE BID BOARD (2021) (S)	1	1
EC10	Flexible Temporary Art and Creative Uses	CRAWLEY TOWN CENTRE BID BOARD (2021) (S)	1	1
EC11	Employment Development and Amenity Sensitive Uses	AGGREGATE INDUSTRIES UK LTD., CEMEX UK OPERATIONS LTD., DAY GROUP LTD. AND BRETT GROUP (2020) – WAS EC10 CRAWLEY TOWN CENTRE BID BOARD (2021) (S)	2	2
EC12	Neighbourhood Centres		0	0
EC13	Rural Economy	SUSSEX WILDLIFE TRUST (2020) – WAS EC12	1	1
GAT1	Development of the Airport with a Single Runway	RESIDENT 2 (2020) THAMES WATER (2020) GATWICK'S BIG ENOUGH (2020) CAGNE (2020; 2021) GATWICK AREA CONSERVATION CAMPAIGN (2020; 2021) UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) GATWICK AIRPORT LIMITED (2020; 2021; 2023)	16	21

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) ENVIRONMENT AGENCY (2020) MOLE VALLEY DISTRICT COUNCIL (2020) SUSSEX WILDLIFE TRUST (2020; 2021) NATURAL ENGLAND (2021) SAVE WEST OF IFIELD CAMPAIGN (2023) HORSHAM DISTRICT COUNCIL (2023) NATIONAL HIGHWAYS (2023) WEST SUSSEX COUNTY COUNCIL (2023)		
GAT2	Safeguarded Land	WEST SUSSEX COUNTY COUNCIL (2021) ARDMORE LAND CONSORTIUM (2021) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021) HX PROPERTIES (2021) BARKER TRUST (2021; 2023) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) GATWICK AIRPORT LIMITED (2021; 2023) SUSSEX WILDLIFE TRUST (2021; 2023) CAGNE (2021) WOODLAND TRUST (2021; 2023) COIF NOMINEES LTD. (2021) RESIDENT 44 (2021) RESIDENTS (SQUIRES PLANNING) (2021) ARORA MANAGEMENT SERVICES (2021; 2023) WT LAMB PROPERTIES/DYE FAMILY/ELLIOT METALS/SIMMONDS FAMILY (2023) PANATTONI UK (TURLEY) (2023) THAMES WATER (2023) AIPUT (2023) HORSHAM DISTRICT COUNCIL (2023)	19	25
GAT3	Gatwick Airport Related Parking	WT LAMB PROPERTIES/DYE FAMILY/ELLIOT METALS/SIMMONDS FAMILY (2020) – WAS GAT2 UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) – WAS GAT2 HX PROPERTIES (2020 – WAS GAT2; 2021; 2023 – SA/SEA) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2020) – WAS GAT2 WILKY GROUP/GATWICK GREEN LTD (2020) – WAS GAT2 GATWICK AIRPORT LIMITED (2020 – WAS GAT2 – S; 2021; 2023 S) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) – WAS GAT2 WOODLAND TRUST (2021; 2023) HORSHAM DISTRICT COUNCIL (2023) NATIONAL HIGHWAYS (2023)	10	15
GAT4	Employment Uses at Gatwick	UK COMMERCIAL PROPERTY FINANCE HOLDINGS LIMITED (2020) – WAS GAT3 ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2020) – WAS GAT3	5	7

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		GATWICK AIRPORT LIMITED (2020 – WAS GAT3; 2021; 2023 – S) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) – WAS GAT3 AIPUT (2023)		
TC1	Primary Shopping Area	CRAWLEY TOWN CENTRE BID BOARD (2021) (S) OXFORD MATCH LIMITED (2021; 2023) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021)	3	4
TC2	Town Centre Neighbourhood Facilities	SUSSEX WILDLIFE TRUST (2020) RESIDENT 39 (2021) CRAWLEY TOWN CENTRE BID BOARD (2021) (S) OXFORD MATCH LIMITED (2021) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021)	5	5
TC3	Town Centre Key Opportunity Sites	RAINIER DEVELOPMENTS LTD. (2020) HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) CRAWLEY TOWN CENTRE BID BOARD (2021) (S) ALDI STORES LTD. (2021) OXFORD MATCH LIMITED (2021) CHICHESTER COLLEGE GROUP (2023) NETWORK RAIL (CRAWLEY STATION CAR PARK) (2023)	7	9
TC4	Active and Engaging Frontages	CRAWLEY TOWN CENTRE BID BOARD (2021) (S) OXFORD MATCH LIMITED (2021)	2	2
TC5	Town Centre First	REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) CRAWLEY TOWN CENTRE BID BOARD (2021) (S) OXFORD MATCH LIMITED (2021; 2023) DT LAST MILE RETAIL (CRAWLEY) UNIT TRUST (2023)	4	5
H1	Housing Provision	RESIDENT 2 (2020) DANESCROFT (RLP CRAWLEY) LLP (2020; 2021) HOME BUILDERS FEDERATION (2020; 2023) HIGHWAYS ENGLAND/NATIONAL HIGHWAYS (2020) GLADMAN DEVELOPMENT LTD (2020; 2021 – S) SUSSEX ORNITHOLOGICAL SOCIETY (2020; 2021) ST. CATHERINE'S HOSPICE (2020; 2021) HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) WAVERLEY BOROUGH COUNCIL (2020; 2021) WEST SUSSEX COUNTY COUNCIL (2020) HOMES ENGLAND (2020) HOMES ENGLAND (2020) PERSIMMON HOMES PLC (2020; 2021; 2023) MOLE VALLEY DISTRICT COUNCIL (2020) SUSSEX WILDLIFE TRUST (2020) INSPIRED VILLAGES (2021) SOUTHERN GAS NETWORK (2021) RESIDENT 49 (2021) A2 DOMINION (2021; 2023) THE SOGNO FAMILY TRUST (2021) CPRE (2023)	31	42

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		SAVE WEST OF IFIELD CAMPAIGN (2023) REIGATE AND BANSTEAD BOROUGH COUNCIL (2023) UNIVERSITIES SUPERANNUATION SCHEME LTD. (2023) WEALDEN DISTRICT COUNCIL (2023) CHICHESTER DISTRICT COUNCIL (2023) WATES (2023) MID SUSSEX DISTRICT COUNCIL (2023) INVIA GROUP LTD. (2023) NATIONAL HIGHWAYS (2023) SLAUGHAM PARISH COUNCIL (2023)		
H2	Key Housing Sites	DANESCROFT (RLP CRAWLEY) LLP (FORGE WOOD) (2020; 2021) THAMES WATER (2020; 2023) WSCC PROPERTY ASSETS (2020 – S; 2021 – S) RESIDENT 7 (2020) SUSSEX ORNITHOLOGICAL SOCIETY (2020; 2021) ST. CATHERINE'S HOSPICE (2020; 2021) TONY FULLWOOD ASSOCIATES (EAST OF STREET HILL/BALCOMBE ROAD) (2020; 2021; 2023) RAINIER DEVELOPMENTS LTD. (2020) WEST SUSSEX COUNTY COUNCIL (2020) HORSHAM DISTRICT COUNCIL (2020; 2021) AGGREGATE INDUSTRIES UK LTD., CEMEX UK OPERATIONS LTD., DAY GROUP LTD. AND BRETT GROUP (2020) – TINSLEY LANE HOMES ENGLAND (TINSLEY LANE) (2020 (S); 2021; 2023) SURREY COUNTY COUNCIL (2020; 2023) BELLWAY HOMES (2020; 2023) ENVIRONMENT AGENCY (2020; 2023) PERSIMMON HOMES PLC (2020; 2023) SUSSEX WILDLIFE TRUST (2020) RESIDENT 23 (BROAD LOCATIONS) (2021) RESIDENT 27 (EAST OF BALCOMBE ROAD/STREET HILL, WORTH) (2021) WOODLAND TRUST (2021; 2023) NATURAL ENGLAND (2021; 2023) RESIDENT 35 (HENTY CLOSE) (2021) SOUTHERN GAS NETWORK (DISUSED GAS HOLDER SITE, FORGE WOOD) (2021) RESIDENT 38 (HENTY CLOSE) (2021) RESIDENT 40 (HENTY CLOSE) (2021) RESIDENT 41 (HENTY CLOSE) (2021) RESIDENT 42 (HENTY CLOSE) (2021) RESIDENT 43 (HENTY CLOSE) (2021) RESIDENT 47 (HENTY CLOSE) (2021) RESIDENT 48 (RUSHETTS ROAD PLAY AREA) (2021) INSPIRED VILLAGES (2021) THE SOGNO FAMILY TRUST (LAND SOUTHEAST HEATHY FARM, BALCOMBE ROAD, FORGE WOOD) (2021) OXFORD MATCH LIMITED (2021; 2023)	47	64

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		RESIDENT 55 (TINSLEY LANE) (2023) RESIDENT 58 (2023) RESIDENT 59 (2023) RESIDENT 60 (TINSLEY LANE) (2023) RESIDENT 62 (TINSLEY LANE) (2023) RESIDENT 63 (2023) RESIDENT 64 (2023) RESIDENT 65 (2023) SUSSEX WILDLIFE TRUST (2023) CHICHESTER COLLEGE GROUP (2023) INVIA GROUP LTD. (SUTHERLAND HOUSE) (2023) NETWORK RAIL (CRAWLEY STATION CAR PARK) (2023) NATIONAL HIGHWAYS (2023) RESIDENT 67?(TINSLEY LANE) (2023)		
H3	Housing Typologies	THE PLANNING BUREAU (2021)	1	1
H3a	Housing Typologies: Estate Regeneration	HORSHAM DISTRICT COUNCIL (2020; 2021; 2023)	1	3
H3b	Housing Typologies: Densification, Infill Opportunities and Small Sites	HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) PERSIMMON HOMES PLC (2020) OXFORD MATCH LIMITED (2021)	3	5
H3c	Housing Typologies: Town Centre Residential Sites	RAINIER DEVELOPMENTS LTD. (2020; 2023) HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) CRAWLEY TOWN CENTRE BID BOARD (2021) (S) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021) OXFORD MATCH LIMITED (2021; 2023) SURREY COUNTY COUNCIL (2023)	6	10
H3d	Housing Typologies: Upward Extensions	HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) GATWICK AIRPORT LIMITED (2020; 2023 – S) SURREY COUNTY COUNCIL (2020) MID SUSSEX DISTRICT COUNCIL (2020; 2021; 2023) CRAWLEY TOWN CENTRE BID BOARD (2021) (S)	5	10
H3e	Housing Typologies: Conversions from Commercial/Non-Residential Uses	SURREY COUNTY COUNCIL (2020; 2023) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2021)	2	3
H3f	Housing Typologies: Open Spaces	HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) NATURAL ENGLAND (2023)	2	4
H3g	Housing Typologies: Urban Extensions (deleted Policy	RESIDENT 1 (2020) RESIDENT 4 (2020) CAGNE (2020) SUSSEX ORNITHOLOGICAL SOCIETY (2020; 2021) RESIDENT 11 (2020)	13	20

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
	now paragraphs 12.17 – 12.23)	HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) RESIDENT 14 (2020) HOMES ENGLAND (2020) MID SUSSEX DISTRICT COUNCIL (2020; 2021; 2023) RESIDENT 15 (2020) SUSSEX WILDLIFE TRUST (2020; 2021) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021) A2 DOMINION GROUP (2021; 2023)		
H4	Future Housing Mix	GLADMAN DEVELOPMENT LTD (2020) ST. CATHERINE'S HOSPICE (2020) RAINIER DEVELOPMENTS LTD. (2020) BELLWAY HOMES (2020) PERSIMMON HOMES PLC (2020) THE SOGNO FAMILY TRUST (2021) OXFORD MATCH LIMITED (2021)	7	7
H5	Affordable Housing	HOME BUILDERS FEDERATION (2020; 2021) GLADMAN DEVELOPMENT LTD (2020) RAINIER DEVELOPMENTS LTD. (2020) TETLOW KING PLANNING (2020) RENTPLUS UK LTD. (2020) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) BELLWAY HOMES (2020) OXFORD MATCH LIMITED (2021) THE PLANNING BUREAU (2021; 2023) INSPIRED VILLAGES (2021) MULLER PROPERTY GROUP (2023)	11	13
H6	Build to Rent		0	0
H7	Self and Custom Build	HOME BUILDERS FEDERATION (2020) GLADMAN DEVELOPMENT LTD (2020; 2021 – S) THE SOGNO FAMILY TRUST (2021)	3	4
H8	Gypsy, Traveller and Travelling Showpeople Sites	GATWICK AIRPORT LIMITED (2020; 2021 – S; 2023 – S) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) HEINE PLANNING CONSULTANCY (2023) NATURAL ENGLAND (2023) HORSHAM DISTRICT COUNCIL (2023)	5	7
H9	Houses in Multiple Occupation		0	0
GI1	Green Infrastructure	SUSSEX ORNITHOLOGICAL SOCIETY (2020) ENVIRONMENT AGENCY (2020) (S) SUSSEX WILDLIFE TRUST (2020) NATURAL ENGLAND (2020; 2021; 2023) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2021) WILKY GROUP/GATWICK GREEN LTD. (2021; 2023) WOODLAND TRUST (2021; 2023) IFIELD SOCIETY (2023)	8	12
GI2	Biodiversity Sites	ENVIRONMENT AGENCY (2020) – WAS GI3 (S) WSCC PROPERTY ASSETS (2020; 2021) – WAS GI3	12	20

		Representations (S = Support)	Representors No.	Representations No.
		Ifield Society (Resident 5) (2020) – was GI3 Crawley Green Party (2020) – was GI3 Sussex Ornithological Society (2020; 2021) – was GI3 Sussex Wildlife Trust (2020 – was GI3; 2021; 2023 s) Natural England (2020; 2021; 2023) Ifield Village Conservation Area Advisory Committee (2021) Wilky Group/Gatwick Green Ltd. (2021; 2023) Woodland Trust (2021; 2023) The Sogno Family Trust (2021) Ifield Society (2023)		
GI3	Biodiversity and Net Gain	Environment Agency (2020) – was GI2 (s) Home Builders Federation (2020) – was GI2 Ifield Society (Resident 5) (2020) – was GI2 Resident 6 (2020) – was GI2 Gladman Development Ltd (2020) – was GI2 Sussex Ornithological Society (2020 – was GI2; 2021) Homes England (2020) – was GI2 Sussex Wildlife Trust (2020 – was GI2; 2021; 2023) Natural England (2020; 2021; 2023) Ifield Village Conservation Area Advisory Committee (2021) Wilky Group/Gatwick Green Ltd. (2021; 2023) The Sogno Family Trust (2021) Home Builders Federation (2021) The Planning Bureau (2021; 2023) AIPUT (2023) Woodland Trust (2023)	16	23
GI4	Local Green Space	Homes England (2020) Sussex Wildlife Trust (2020; 2023 – s) Natural England (2020; 2023) Ifield Village Conservation Area Advisory Committee (2021) Resident 46 (2021) Rusper Parish Council (2021)	6	8
SDC1	Sustainable Design and Construction	Rainier Developments Ltd. (2020) Surrey County Council (2020) Ardmore Ltd. (2020; 2021; 2023) Environment Agency (2020) HX Properties (2021) The Planning Bureau (2021; 2023) AIPUT (2023) Natural England (2023) Resident 66? (2023)	9	12
SDC2	District Energy Networks	Universities Superannuation Scheme Ltd. (2020 s) Surrey County Council (2020) Ardmore Ltd. & Consortium (2020; 2021)	3	4

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
SDC3	Tackling Water Stress	SURREY COUNTY COUNCIL (2020) ARDMORE LTD. & CONSORTIUM (2020; 2021) ENVIRONMENT AGENCY (2020; 2023) SOUTHERN WATER (2020) NATURAL ENGLAND (2020; 2021; 2023) CPRE SUSSEX (2023) AIPUT (2023)	7	11
SDC4	Water Neutrality	CPRE SUSSEX (2023) PERSIMMON (2023) SAVE WEST OF IFIELD CAMPAIGN (2023) AIPUT (2023) GLADMAN DEVELOPMENT LTD. (2023) HOME BUILDERS FEDERATION (2023) CHICHESTER DISTRICT COUNCIL (2023) NATURAL ENGLAND (2023) SUSSEX WILDLIFE TRUST (2023) HORSHAM DISTRICT COUNCIL (2023) ARDMORE LTD. (2023)	11	11
EP1	Development and Flood Risk	RESIDENT 2 (2020) THAMES WATER (2020(S); 2023 (S)) ENVIRONMENT AGENCY (2020; 2023) WILKY GROUP/GATWICK GREEN LTD. (2021;2023)	4	7
EP2	Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions	ENVIRONMENT AGENCY (2020; 2023)	1	2
EP3	Land and Water Quality	ENVIRONMENT AGENCY (2020) SOUTHERN GAS NETWORK (2021)	2	2
EP4	Development and Noise	DANESCROFT (RLP CRAWLEY) LLP (2020; 2021) HOMES ENGLAND (2020) PERSIMMON HOMES PLC (2020; 2021; 2023) GATWICK AIRPORT LIMITED (2020; 2021; 2023) THE SOGNO FAMILY TRUST (2021) BELLWAY HOMES (2023) SAVE WEST OF IFIELD CAMPAIGN (2023) NATIONAL HIGHWAYS (2023)	8	13
EP5	Air Quality	NATURAL ENGLAND (2023)	1	1
EP6	External Lighting	SUSSEX WILDLIFE TRUST (2021)	1	1
ST1	Development and Requirements for Sustainable Transport	HIGHWAYS ENGLAND/NATIONAL HIGHWAYS (2020; 2021; 2023) RESIDENT 2 (2020) RESIDENT 8 (2020) RESIDENT 9 (2020) GATWICK AIRPORT LIMITED (2020; 2021; 2023) WILKY GROUP/GATWICK GREEN LTD. (2020; 2021; 2023) WEST SUSSEX COUNTY COUNCIL (2020; 2021; 2023)	10	19

		REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
		SAVE WEST OF IFIELD CAMPAIGN (2023) ARDMORE LTD. (2021; 2023) SURREY COUNTY COUNCIL (2023)		
ST2	Car and Cycle Parking Standards	HOME BUILDERS FEDERATION (2020; 2021) ST. CATHERINE'S HOSPICE (2020; 2021) RAINIER DEVELOPMENTS LTD. (2020) BELLWAY HOMES (2020) PERSIMMON HOMES PLC (2020) THE PLANNING BUREAU (2021) ARDMORE LTD. (2023)	7	9
ST3	Improving Rail Stations	HOMES ENGLAND (2020) GATWICK AIRPORT LIMITED (2020; 2021; 2023 – S) CRAWLEY TOWN CENTRE BID BOARD (2021) (S)	3	5
ST4	Area of Search for a Crawley Western Multi-Modal Transport Link	RESIDENT 2 (2020) HIGHWAYS ENGLAND/NATIONAL HIGHWAYS (2020; 2023) IFIELD SOCIETY (RESIDENT 5) (2020) CRAWLEY GREEN PARTY (2020) SUSSEX ORNITHOLOGICAL SOCIETY (2020; 2021) HORSHAM DISTRICT COUNCIL (2020; 2021; 2023) ARDMORE LTD. & CONSORTIUM (2020; 2021; 2023) IFIELD VILLAGE CONSERVATION AREA ADVISORY COMMITTEE (2020; 2021) RESIDENT 12 (2020) (S) RESIDENT 14 (2020) HOMES ENGLAND (2020) BARKER TRUST (2020 (S); 2021; 2023) GATWICK AIRPORT LIMITED (2020; 2021; 2023) HISTORIC ENGLAND (2020) ENVIRONMENT AGENCY (2020) RESIDENT 15 (2020) SUSSEX WILDLIFE TRUST (2020; 2021; 2023) RESIDENT 7 (2021) WEST SUSSEX COUNTY COUNCIL (2021) HX PROPERTIES (2021) WOODLAND TRUST (2021; 2023) COIF NOMINEES LTD. (2021) RUSPER PARISH COUNCIL (2021) SAVE WEST OF IFIELD CAMPAIGN (2023) AIPUT (2023)	25	39
Planning Obligations Annex		SPORT ENGLAND (2020) GATWICK GREEN LTD. (2023)	2	2
Parking Standards Annex			0	0
Noise Annex		GATWICK AIRPORT (2020) DANESCROFT (RLP CRAWLEY) LLP (2020; 2021) RESIDENT 11 (2021) BELLWAY HOMES (2023)	4	5
Housing Trajectory Base Date 31 March 2023		REIGATE AND BANSTEAD BOROUGH COUNCIL (2020) CHICHESTER COLLEGE GROUP(2023)	2	2

	REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
Employment Land Trajectory Base Date 31 March 2023	WILKY GROUP/GATWICK GREEN LTD. (2020; 2023)	1	2
Sustainability Appraisal	GLADMAN DEVELOPMENTS LTD. (2020; 2021) DANESCROFT (RLP CRAWLEY) LLP (2020; 2021) SUSSEX ORNITHOLOGICAL SOCIETY (2020; 2021) HX PROPERTIES (2020; 2021 – GAT3; 2023) HOMES ENGLAND (2020) WILKY GROUP/GATWICK GREEN LTD. (2020 – SD3/EC1; 2021 – EC1/EC4/GAT2/ST1/IN1; 2023) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020; 2021; 2023 – S) HISTORIC ENGLAND (2020; 2023) ENVIRONMENT AGENCY (2020; 2023) SUSSEX WILDLIFE TRUST (2020) NATURAL ENGLAND (2020; 2023) RESIDENT 31 (2021) RESIDENTS (SQUIRES PLANNING) (2021) THE SOGNO FAMILY TRUST (2021) CHICHESTER COLLEGE GROUP (2023)	15	26
Habitats Regulations Assessment	SUSSEX ORNITHOLOGICAL SOCIETY (2020) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020; 2021; 2023 – S) NATURAL ENGLAND (2020; 2021; 2023 – S) MID SUSSEX DISTRICT COUNCIL (2020; 2021; 2023)	4	10
Infrastructure Plan	WEST SUSSEX COUNTY COUNCIL (2020; 2023) HOMES ENGLAND (2020) ENVIRONMENT AGENCY (2023) NETWORK RAIL (2023)	4	5
Strategic Housing Land Availability Assessment	RESIDENT 7 – SHLAA SITE REFERENCE 72; PAGE 172 (2020) NHS PROPERTY SERVICES (2020) SOUTHERN GAS NETWORK (2021) RESIDENT 61 (2023) INVIA GROUP LTD. (2023)	5	5
Viability	HOME BUILDERS FEDERATION (2020) DEPARTMENT FOR EDUCATION (2020) GLADMAN DEVELOPMENTS (2021) THE PLANNING BUREAU (2021)	4	4
Duty to Cooperate	HOME BUILDERS FEDERATION (2020) ARUN DISTRICT COUNCIL (2020) (S) GLADMAN DEVELOPMENTS LTD (2020; 2021) RESIDENT 10 (2020; 2021) REIGATE AND BANSTEAD BOROUGH COUNCIL (2020; 2021) MOLE VALLEY DISTRICT COUNCIL (2020) RESIDENTS (SQUIRES PLANNING) (2021) THE SOGNO FAMILY TRUST (2021) DANESCROFT (2021)	9	12

	REPRESENTATIONS (S = SUPPORT)	REPRESENTORS NO.	REPRESENTATIONS NO.
Local Plan Map	AGGREGATE INDUSTRIES UK LTD., CEMEX UK OPERATIONS LTD., DAY GROUP LTD. AND BRETT GROUP (2020) HOMES ENGLAND (2020) ABERDEEN STANDARD INVESTMENTS IN PARTNERSHIP WITH THE BARKER TRUST (2020) COIF NOMINEES LTD. (2021) – MANOR ROYAL BOUNDARY; GAT2 ADMORE/WINDSOR LAND CONSORTIUM – CL8 WILKY GROUP/GATWICK GREEN LTD. – EC4 MR. TREVOR SAVAGE (TS LEISURE & PROPERTY) WEST SUSSEX COUNTY COUNCIL – MINERALS SAFEGUARDING	8	8
Local Development Scheme	RESIDENTS (SQUIRES PLANNING) (2021)	1	1
Statement of Community Involvement	RESIDENTS (SQUIRES PLANNING) (2021)	1	1

7. Examination Stage

Table 10: Independent Examination Stage of Consultation
Extract from Statement of Community Involvement

INSPECT	***Stage three – independent examination***
	Consider feedback received at stage three and any other new evidence to inform a final plan. Publish a consultation statement to demonstrate how the commitments outlined in the Statement of Community Involvement have been met. This will set out how consultation responses have been taken into account in producing the plan. If a Development Plan Document is being produced, this must be submitted to the Secretary of State for independent examination. **Interested parties may submit written representations to the Inspector and may request to take part in the examination. The Inspector makes this decision. Anyone can observe the examination.** Provided the plan is found 'sound' at the examination it can be considered at Full Council for formal adoption.

7.1 As part of the Local Plan examination process, due regard must be given to the outcomes of the Early Engagement and Publication consultations. All feedback received was considered by the council and the messages from the consultations were collated and summarised (see Sections 3, 4, 5 and 6 above, along with Appendices 2, 4, 6 and 8).

7.2 The Crawley Borough Local Plan was submitted to the Secretary of State for its independent Examination on 31 July 2023. Two Inspectors were appointed to carry out the Examination of the Plan: Mr. David Spencer BA(Hons) DipTP MRTPI and Mr. Glen Rollings BA (Hons) MAUD MRTPI.

7.3 The outcomes of the consultation from all three stages of Regulation 19 Consultation, along with the Early Engagement, were submitted, in full, alongside the draft Local Plan to the Secretary of State. These have informed the appointed Planning Inspectors and have been considered as the Plan has been taken forward through its independent examination.

7.4 As part of the Local Plan Examination, the council submitted a document which provided the Crawley Borough Council Officer Responses to the Formal Public Consultation Representations 2019 to 2023[8]. This included the Regulation 18 (2019) officer responses along with officer responses to the summaries from each of the Regulation 19 consultations carried out in 2020, 2021 and 2023.

7.5 Examination Hearing Sessions were carried out in two parts:

- Part 1 of the hearing sessions were held during the week beginning 20 November 2023. Sitting days were held on 21-23 November.
- Part 2 of the hearing sessions took place during the weeks beginning 8 January 2024 and 15 January 2024, on 9, 10, 11 and 16 January 2024.

[8] Crawley Borough Consultation Statement Officer Responses to the Formal Public Consultation Representation Summaries, September 2023 (CBC): CBC.KD_.CS_.01k Crawley borough consultation statement – CBC's officer responses to the formal public consultation representation summaries, September 2023.pdf

Table 11: Local Plan Review Programme Timetable

Stage	**Date**
Early Engagement consultation	15 July 2019 – 16 September 2019
Full Council	16 December 2019
Initial Publication consultation	20 January – 2 March 2020
Additional Publication consultation	6 January – 30 June 2021
Further Publication (Submission) consultation	9 May – 20 June 2023
Submission	31 July 2023
Examination in Public Hearing Sessions	21 – 23 November 2023 9 – 11 January 2024 16 January 2024
Modifications Consultation	12 February – 25 March 2024
Adoption (anticipated)	July 2024

8. Modifications Stage

8.1 Following the conclusion of the two stages of Examination Hearings in November 2023 and January 2024, the council received a Post Hearings Letter from the Planning Inspectors[9] (31 January 2024). The Inspectors have invited the council to finalise the Schedule of Proposed Modifications.

8.2 The modifications proposed to the Crawley Borough Local Plan are characterised in three forms:

1. Main Modifications – these are the modifications which are being consulted on and form part of the Inspectors' determination into the soundness of the Local Plan.
2. Associated Modifications to the Local Plan Map.
3. Additional Modifications – these are the additional (minor) modifications being proposed by the council for the purposes of clarity and factual correctness. These have been published alongside the Main Modifications consultation, for the sake of completeness. However, these don't form part of the consultation (as they can be made by the council to the Local Plan since they are not considered to affect soundness).

8.3 A Schedule of Main Modifications and a Schedule of Modifications to the Local Plan Map has been prepared for statutory consultation in accordance with guidance published by the Planning Inspectorate[10].

8.4 For completeness, the council has also published a Schedule of Additional Modifications. This includes corrections and clarifications. These changes make the plan clearer and provide factual updates but don't materially affect the implementation of the plan policies. These Modifications are not being consulted on, and the Inspectors will not consider any comments made about these minor changes.

8.5 The Modifications Consultation is a six-week period of public consultation which provides the opportunity for comment on the proposed Main Modifications being considered as part of the Examination of Crawley's Local Plan.

8.6 The consultation runs from **12 February 2024 until 5pm on 25 March 2024**.

8.7 Following the close of consultation, all responses received will be collated and submitted to the Planning Inspectorate as part of the Local Plan's independent examination.

What are the Consultation's aims?

8.8 The consultation aims are:

- To conduct the consultation in line with the Statement of Community Involvement and the Planning Inspectorate Guidance;
- To provide people the opportunity to comment on the Main Modifications proposed to the Crawley Borough Local Plan as part of the Examination process.

Who we are consulting

8.9 The formal public consultation is open for the involvement and engagement for all who have an interest in Crawley borough. This includes those who live, work and

[9] ID-026 Post Hearings Letter, 31 January 2024, Planning Inspectorate: ID-026 Post Hearings Letter 31 Jan 2024.pdf (crawley.gov.uk)
[10] Procedure Guide for Local Plan Examinations, Section 6: Procedure Guide for Local Plan Examinations - GOV.UK (www.gov.uk)

visit the town, as well as investors, businesses, landowners, developers, neighbouring authorities and interest groups (national, south east England, Sussex and local).

8.10 A public notice was published. This has also been placed on the council's Public Notices page of the website and linked from the Local Plan Examination webpages.

8.11 A dedicated webpage for the Modifications Consultation has been set up and linked from the Crawley Borough Local Plan Examination webpages.

8.12 Those subscribed to the Crawley Borough Council email alert system have been notified through the Planning News emails. These include statutory consultees, developers, stakeholders, interest groups, and individual residents.

8.13 Those who made representations at the submission consultation stages (Regulation 19) were informed of the proposed Main Modifications consultation through the Programme Officer.

How the consultation is being conducted

8.14 The Main Modifications are set out in a Schedule of Main Modifications, February 2024. The council is inviting representations on the Schedule of Main Modifications.

8.15 Alongside this, the council has published the following Key Documents:

- Crawley Borough Modifications Local Plan 2023 to 2040, February 2024
- Schedule of Modifications to the Crawley Local Plan Map, February 2024
- Schedule of Additional Modifications to the Crawley Borough Local Plan, February 2024
- Crawley Local Plan Sustainability Appraisal, February 2024
- Crawley Borough Council Habitats Regulations Assessment Addendum, February 2024
- Crawley Borough Local Plan Consultation Statement, February 2024 (this document)
- Crawley Borough Council Monitoring and Implementation Framework, February 2024

8.16 The Main Modifications subject to public consultation are clearly distinct from the additional modifications and existing text in the Modifications Local Plan, February 2024 using the following formatting:

Blue Text, Bold, Underlined:	Main Modifications additional text to Submission Local Plan (May 2023) version
~~Red, Strike-through Text:~~	Main Modification Deleted text from Submission Local Plan (May 2023) version
Green Text, Underlined:	Additional (minor) Modifications additional text to Submission Local Plan (May 2023) version
~~Grey, Strike-through Text:~~	Additional (minor) Modification Deleted text from Submission Local Plan (May 2023) version

8.17 At this stage, comments can only be made on the proposed Main Modifications to the Plan. This consultation is not an opportunity to raise matters relating to other

parts of the Plan that have already been considered by the Inspectors during the Examination process.

8.18 Representations should be provided in writing. This can be done by completing and submitting the council's Local Plan consultation representation form, using the following methods:

- Online: using the council's eform at www.crawley.gov.uk/localplanreview
- Email: strategic.planning@crawley.gov.uk
- Post: Forward Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley RH10 1UZ.

8.19 All representations received within the statutory consultation period will be submitted to the Planning Inspectors for consideration with their final report.

Document Availability

8.20 During the Main Modification representation period, the Schedule of Main Modifications, Main Modification Crawley Borough Local Plan and all of its supporting documents will be available to view online at www.crawley.gov.uk/localplanreview

8.21 Paper copies of the documents, and the representation form and guidance note, will be available to view in the Town Hall and Crawley Library during normal opening hours:

- Town Hall: The Boulevard, Crawley RH10 1UZ. Opening hours: Monday to Friday 9am-4pm.
- Crawley Library: Southgate Avenue, Southgate, Crawley RH10 6HG. Opening hours: Monday to Friday 9am-6pm and Saturday 9am-5pm.

9. Monitoring

Table 12: Monitor Stage of Consultation Extract from Statement of Community Involvement

MONITOR	Monitor the plan to make sure that policies are achieving their aims, and consider, if necessary, reviewing them to reflect any changes. Monitor the effects of plan policies as required by European Directives, or any new legislation which replaces these

9.1 The final stage in the council's Statement of Community Involvement refers to the monitoring stage. This is vital to ensure that the Local Plan, once adopted, achieves its aims and remains up-to-date and carries full weight in Development Management decisions.

9.2 The Local Plan is supported by the Monitoring and Implementation Framework[11]. This contains monitoring indicators aimed at ensuring the objectives of the Local Plan are implemented and the policies remain relevant and effective.

9.3 The outcomes of the assessment against these indicators will be published in the form of the Authority's Monitoring Report[12], at least annually (but not limited to) as the data is available.

9.4 The Local Plan includes an expectation that a review will be undertaken in 2029, at the latest, in accordance with the requirements of the National Planning Policy Framework[13]. Should it be considered at that stage that a partial or full update of the Local Plan is required, this will be reported in the Authority's Monitoring Report and the timetable for this process will be established in the council's Local Development Scheme[14].

9.5 The Local Plan includes an expectation for a review to be considered should changes to national aviation policy allow for the removal of safeguarding from all of the land currently safeguarded for Gatwick Airport expansion. In addition, should Southern Water implement a strategic, permanent alternative water source for the Sussex North Water Resource Zone, the Local Plan's water neutrality requirements will be reviewed[15].

[11] Monitoring and Implementation Framework, May 2023 (Modification Consultation version, February 2024, to be published alongside this consultation): Monitoring and implementation (crawley.gov.uk)
[12] Authority's monitoring report | Crawley GOV
[13] National Planning Policy Framework, July 2021, paragraph 33: [ARCHIVED CONTENT] (nationalarchives.gov.uk)
[14] Local Development Scheme | Crawley GOV
[15] Crawley Borough Local Plan Modifications Consultation, paragraphs 1.34-1.37, February 2024 (CBC): Local Plan | Crawley GOV