



Our ref: NH/24/05042

Your ref: Crawley Borough Local Plan Main Modifications Consultation

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**FAO: Elizabeth Brigden
Planning Policy Manager
Crawley Borough Council**

Dear Elizabeth,

Crawley Borough Local Plan Main Modifications Consultation

Thank you for inviting National Highways (NH) to comment on the Crawley Borough Local Plan Main Modifications (February 2024), seeking a response by no later than Monday 25 March 2024.

We have read the guidance note for this exercise.

We understand that comments are sought on the Main Modifications to the Local Plan. This consultation is not an opportunity to raise matters relating to other parts of the Local Plan that have already been considered by the inspectors during the examination process.

We also understand that the focus of this consultation is on whether we consider the Main Modifications comply with legal requirements, the duty to cooperate, and whether they would make the Local Plan sound.

Policy Context

NH is the company responsible for the Strategic Road Network (SRN), with our focus being on its safety, reliability, and operational efficiency.

The policy of the Secretary of State for Transport in relation to the SRN is **Circular 1/2022: [Strategic road network and the delivery of sustainable development](#)**. In responding to this consultation, NH has taken Circular 1/2022 as relevant national policy.

In addition, the policy context for our response includes the Government's [National Planning Policy Framework](#) (NPPF) (December 2023).

NH has recently updated its '[Planning Guide](#)' (October 2023) which sets out how the company engages with the planning system, including plan-making. This was updated in the context of 01/2022.

In terms of plan-making, our engagement is focused on exploring opportunities to reduce the reliance on the SRN for local journeys including a reduction in the need to travel and maximising opportunities for walking, wheeling, cycling, public transport and shared travel.

Consultation Response - Focus

Our response is focused on whether the Main Modifications would make the submitted Local Plan sound.

In particular, whether the Main Modifications would ensure the Local Plan is:

- **Effective** - deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** - enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, including the Department for Transport (DfT) Circular 01/2022.

A summary of NH's position concludes the response.

Table 1: National Highways' representations

NH Rep. No.	Main Modification Ref.	Local Plan (May 2023) Section	NH response
NH001	MM10	Policy IN1 (Infrastructure Provision) and para. 8.8	NH welcome and support the proposed additional text. Reference to the detailed Infrastructure Delivery Schedule and ensuring that this is kept up-to-date as part of the 'monitor and manage' process would ensure the Local Plan is effective and consistent with national policy (DfT Circular 01/2022).
NH002	MM11	Para. 8.9	NH welcome and support the proposed additional text. The convening of the Transport Infrastructure Management Group (TIMG), including National Highways, to keep the effectiveness, deliverability, and phasing of the transport infrastructure projects required to deliver the Local Plan strategy under review as part of the 'monitor and manage' process would ensure the Local Plan is effective and consistent with national policy (DfT Circular 01/2022). We must stress that the terms of reference for TIMG need to be developed and shared as a matter of priority so that all parties involved can understand how it will operate and what is expected.
NH003	MM12	Policy IN2 (The Location and Provision of New Infrastructure)	NH welcome and support the proposed additional text. Reference to the Infrastructure Delivery Schedule and the need for major facilities to be located in the most sustainable locations accessible by public transport

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			and/or active travel routes would ensure the Local Plan is effective and consistent with national policy (DfT Circular 01/2022).
NH004	MM16	Policy EC4 (Strategic Employment Location: Gatwick Green)	NH welcome and support the proposed additional text. Requirements for a master plan-level vision for the development and a construction management and phasing plan to mitigate any adverse impacts on the strategic road network would ensure the Local Plan is consistent with national policy (DfT Circular 01/2022).

Concluding Comments

Thank you for engaging with NH on this consultation.

In summary, the Main Modifications highlighted in Table 1 (above) would make the Local Plan sound. They would ensure that the Local Plan is effective and consistent with national policy.

If you have any questions with regards to the comments made in this response, please do not hesitate to contact us via PlanningSE@nationalhighways.co.uk

Yours sincerely



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