

CRAWLEY BOROUGH LOCAL PLAN EXAMINATION

Crawley Borough Council Response to Inspector's
Matters, Issues and Questions

Matter 1: Legal Compliance and Procedural Matters

February 2015



CBC/001 Matter 1 Legal Compliance and Procedural Matters February 2015

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

CBC/001 Matter 1: Legal Compliance and Procedural Matters

Contents:

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

Duty to co-operate

- 1.1 In preparing the Crawley Borough Local Plan (CBLP), has the Council fulfilled the 'duty to co-operate' requirements of section 33A of the Planning and Compulsory Purchase Act 2004?
- 1.2 Has Crawley made 'every effort' in its collaborative working with neighbouring authorities to seek delivery of its unmet needs? Could Crawley realistically have done more in its plan preparation to fulfil the duty to co-operate? The three Northern West Sussex authorities recognise that not all their combined housing needs will be met – does this signal a failure to co-operate effectively?

Other legal compliance matters

- 1.3 Is the CBLP in general accordance with the Council's Statement of Community Involvement?
- 1.4 Has the CBLP emerged from an open and transparent process that demonstrates how and why the preferred strategy was selected, in consultation with the public and other stakeholders?
- 1.5 Has the CBLP been the subject of suitably comprehensive and satisfactory Sustainability Appraisal, Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations?
- 1.6 Has the CBLP been prepared in accordance with the Council's Local Development Scheme (LDS)? Is there sufficient recognition in the LDS of the need to review the Plan following the Government's decision on a second runway at Gatwick airport?

Appendices (separate document)

Appendix A: Timeline for Key Duty to Cooperate Milestones (February 2015)

Appendix B: Correspondence in Relation to Crawley's Unmet Needs:

1. Reigate and Banstead Core Strategy
Publication (April 2012)
2. Mid Sussex District Plan
Preferred Strategy (January 2012)
Publication: Housing and Economy Representations (June 2013)
Preferred Strategy (January 2015)
3. Horsham District Planning Framework
Housing Numbers (April 2012)
Preferred Strategy (October 2013)
Duty to Cooperate Unmet Needs (June 2014)
Publication (June 2014)

Appendix C: Northern West Sussex Position Statement – Update February 2015

Appendix D: Correspondence from Natural England on Habitat Regulations (email dated 29/11/13)

Appendix E: Local Development Scheme Timetables

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

Duty to co-operate

1.1 In preparing the Crawley Borough Local Plan (CBLP), has the Council fulfilled the 'duty to co-operate' requirements of section 33A of the Planning and Compulsory Purchase Act 2004?

1.1.1 The Crawley Borough Local Plan, (CBLP), has been prepared within the context of lengthy historic and ongoing co-operation with its neighbouring authorities and partners. These extend beyond the immediate boundaries of the borough and include:

- the Northern West Sussex Housing Market Area (HMA);
- wider housing market area;
- functional economic area;
- river basin catchment area;
- Gatwick Airport area;
- Coast to Capital Local Enterprise Partnership (LEP) Area; and
- other environmental extents (including the Gatwick Greenspace Partnership area and the High Weald Area of Outstanding Natural Beauty).

1.1.2 Full details of the frameworks, mechanisms and outcomes of the co-operation are explained in the CBLP Duty to Cooperate (DtC) Statement¹. The commencement of this co-operation pre-dates the enactment of the Localism Act in 2011, with significant work already taking place at a Gatwick Diamond level in relation to the preparation of the Core Strategy, and has continued and evolved during the preparation of the Plan, taking into account new and emerging best practice as it developed. A Joint Area Action Plan for the West of Bewbush² was prepared and adopted by Crawley Borough and Horsham District Councils which has enabled the successful delivery of a new neighbourhood immediately adjacent to Crawley borough's administrative boundaries within Horsham District.

1.1.3 The Duty to Co-operate has involved:

- Meetings at different geographical levels and groupings, at both officer and member levels;
- Joint approaches to Plan making (including through the strategic framework offered by the preparation and agreement of the Gatwick Diamond Local Strategic Statement and the West of Bewbush Joint Area Action Plan);
- Joint Evidence Base³;
- Agreed Methodology for evidence base studies;
- Statements of Common Ground, Agreements for Co-operation, Memorandums of Understanding and Joint Position Statements⁴;

¹ LP006: Crawley Submission Duty to Co-operate Statement (2014) CBC

² LP088: West of Bewbush Joint Area Action Plan (2009) CBC and HDC

³ LP006: Crawley Submission Duty to Cooperate Statement, para. 2.11-2.12; and Appendix B (2014) CBC

⁴ LP048: Gatwick Diamond Local Strategic Statement (2011); LP049: Gatwick Diamond Local Strategic Statement Memorandum of Understanding; LP129: Northern West Sussex Position Statement (2014 and 2015 update); LP130: Horsham District Council and Coast to Capital LEP Authorities Report (2014); LP131: RBBC and CBC Statement of Common Ground on meeting strategic housing needs (2013); LP132: RBBC and CBC on

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

- Recognition by adjoining authorities of the unmet need arising from within Crawley, influencing decisions in policy preparations and resulting in commentary in the supporting text of adjoining authorities' emerging and adopted Local Plans⁵
- Recognition within supporting text and the extensive evidence base to the CBLP of the importance of addressing predicted unmet need within the borough boundary as far as possible, or within the HMA in so far as constitutes sustainable development, including continuing to explore potential urban extensions in the form of new neighbourhoods to Crawley to the east and/or west of the borough's administrative boundary.

1.1.4 The DtC is ongoing and Appendix A of this Statement presents the most up-to-date timeline for co-operation, including that which has taken place since submission and that anticipated to continue forward; this is updated and more comprehensive than the information in the Timeline provided as part of the submitted Crawley DtC Statement⁶, and effectively replaces that previous version.

meeting the Duty to Cooperate and Retail issues relating to Reigate and Banstead Borough Council Draft Core Strategy (2014); LP133: Brighton and Hove City Council: Provision of Housing – A Statement of Common Grounds (2013); LP134: Lewes Duty to Cooperate: Cross Boundary Working and Meeting Housing Needs (2014); LP135: Gatwick Airport Memorandum of Understanding (2009); CBC and HDC Statement of Common Ground on Climate Change and Renewable Energy (2015)

⁵ CBC/012: Council's Response to Inspector's Matter 5: Character and Environment, Issue 2, Appendix K: CBC and HDC Statement of Common Ground on Climate Change and Renewable Energy, February 2015 (2015) CBC

⁶ LP006: Crawley Submission Duty to Co-operate Statement, Appendix A (2014) CBC

1.2 Has Crawley made ‘every effort’ in its collaborative working with neighbouring authorities to seek delivery of its unmet needs? Could Crawley realistically have done more in its plan preparation to fulfil the duty to co-operate? The three Northern West Sussex authorities recognise that not all their combined housing needs will be met – does this signal a failure to co-operate effectively?

- 1.2.1 Crawley has a long history of working co-operatively across its boundaries, particularly in relation to delivering development needs as it has become increasingly constrained with the growth levels planned for in the original New Town masterplan more than doubled. This is evidenced by the successful preparation and adoption of a Joint Area Action Plan by the two councils, Crawley Borough and Horsham District, for the new neighbourhood, Kilnwood Vale. This is delivering 2,500 new dwellings and a new neighbourhood centre, complementary in character to the principles of the New Town master plan.
- 1.2.2 Crawley Borough Council (CBC), recognising that it cannot meet its own need, has proactively and positively sought to meet the DtC throughout the Plan preparation. At every stage, the CBLP early engagement consultations have made clear reference to the constraints of the borough and the high emerging needs arising for development land. This has also been raised during every meeting with other authorities during which strategic development needs were discussed, at both officer and member levels. The council has also responded positively to representations, made in response to the consultations, from the neighbouring authorities⁷ challenging Crawley to meet as much of its own needs within its administrative boundaries as it is able, by taking a ‘no stone unturned’ approach. This has resulted in evident acceptance of Crawley’s unmet needs position from neighbouring authorities⁸.
- 1.2.3 Submissions have been made to neighbouring authorities’ Local Plan consultations confirming CBC’s understanding of the strategic and cross-boundary issues, including the anticipated unmet needs arising from the borough (see Appendix B). The draft DtC Statement was shared, for comments and input, with the Prescribed DtC Bodies as it emerged; Appendix E of the DtC Statement⁹ summarises the responses received and how the document was changed in response to them. A formal letter was sent in August 2014 to local authorities within the wider housing market area confirming the emerging submission Local Plan’s anticipated unmet needs and formally

⁷ LP004: Crawley Local Plan Consultation Statement, Appendix 3, p140-143; p166-167; and Appendix 4, p402; p408; and p413 (2014) CBC

⁸ Reigate and Banstead Core Strategy, para 7.4.3 (adopted 2014) RBBC; Horsham District Planning Framework, para 6.6 (submitted 2014) HDC; Mid Sussex District Plan submission consultation draft, para 3.15-3.19 (2015) MSDC

⁹ LP006: Crawley Submission Duty to Cooperate Statement, p102-118 (2014) CBC

requesting assistance to help meet these (Appendix F of the DtC Statement¹⁰); responses to this letter are summarised in Appendix G of the DtC Statement¹¹.

- 1.2.4 The NWS Authorities acknowledged the unmet Objectively Assessed needs which would emerge without being met in full within the housing market area (as set out in the NWS Position Statement July 2014¹²). However, this was never intended to represent a fixed position and the Statement (paragraph 6.10) confirms that work will be ongoing to understand the objectively assessed need, particularly to reflect the release of the anticipated DCLG Household Projections. Paragraph 6.13 confirms that the housing supply numbers indicate an improved position to that previously set out in the NWS Position Statement September 2013, reflecting the positive and effective duty to cooperate taking place, and that all three authorities are doing all they can to maximise capacity for housing development within their boundaries and reduce shortfall across the housing market area. Paragraph 6.17 identifies how the three authorities will continue to work together to understand how the projected housing shortfall can be reduced, including working the LEP to address barriers and constraints to development.
- 1.2.5 The figures presented in Table 1 in the July Position Statement reflected the position at July 2014. Due to its timing, this could not take into account the subsequent work undertaken within Crawley, leading to increased numbers in Crawley's Housing Trajectory¹³. It also does not include the subsequent work between the three authorities on the Strategic Housing Land Availability Assessment, the Call for Sites and Sustainability Appraisal of cross-boundary options being undertaken by MSDC for their re-Submission District Plan, nor the further work currently being undertaken by HDC following their Examination Hearings into the Horsham District Planning Framework and their Inspector's Initial Findings letter. A further updated Position Statement is attached to this Statement in Appendix C which shows the emerging position, and demonstrates that the NWS authorities are meeting their demographic needs in full within the HMA, the five-year land requirements across the housing market area are met, and that overall they are getting closer to meeting their full objectively assessed needs within the HMA.
- 1.2.6 The CBLP is unable to allocate land outside the administrative boundaries of Crawley (beyond the remit of the Local Plan area) nor can it dictate to its adjoining, or nearby, districts how much of, or where the borough's unmet needs should be accommodated. However, the Plan does state that opportunities for further urban extensions east and/or west of Crawley will continue to be explored with neighbouring authorities¹⁴. The Unmet Needs Topic Paper¹⁵, prepared to support the submission Local Plan, illustrates the known planned and speculative strategic development areas in reasonable close proximity which would, in practice, go some

¹⁰ LP006: Crawley Submission Duty to Cooperate Statement, p121-125 (2014) CBC

¹¹ LP006: Crawley Submission Duty to Cooperate Statement, p127-141 (2014) CBC

¹² LP129: Northern West Sussex Position Statement, Table 1, para 6.13 (2014) CBC, HDC, MSDC

¹³ LP080: Crawley Housing Trajectory (2014) CBC

¹⁴ LP001: Crawley Borough Local Plan, 2.26; and para 6.41 (September 2014) CBC

¹⁵ LP014: Topic Paper 5: Unmet Needs (2014) CBC

way to meeting needs arising from Crawley; these planned developments are proposed to meet needs arising from within the administrative area in which they are located, but much of this need is likely to have arisen from in-migration flows from Crawley (see past migration relationships between the three northern West Sussex Authorities set out in Table 1.1, below). Appendix K of the Crawley Strategic Housing Land Availability Assessment (SHLAA)¹⁶ is produced as a joint section for Strategic Sites across the NWS HMA, to allow infrastructure constraints to be jointly assessed for possible resolutions.

Table 1.1 – Internal Migration Flows between North West Sussex Authorities 2002/2011 (ONS)

2002		TO		
		Mid Sussex	Horsham	Crawley
FROM	Mid Sussex	-	340	320
	Horsham	330	-	270
	Crawley	620	520	-

Mid Sussex – Horsham difference: 10pa

Mid Sussex – Crawley difference: 300pa

Crawley – Horsham difference: 250pa

2011		TO		
		Mid Sussex	Horsham	Crawley
FROM	Mid Sussex	-	370	450
	Horsham	290	-	340
	Crawley	500	380	-

Mid Sussex – Horsham difference: 70pa

Mid Sussex – Crawley difference: 50pa

Crawley – Horsham difference: 10pa

- 1.2.7 Work undertaken in Horsham and Mid Sussex, which Crawley has been involved with, has sought to quantify the pressures these districts are facing from unmet needs arising in Crawley, but also from overlapping or adjoining housing market areas such as Coastal West Sussex (including Brighton and Hove, Lewes), the constrained Green Belt authorities in Surrey, rural Wealden in East Sussex and the unknown requirements emerging from London. This work has assessed the links between these authorities based on past migration trends, travel to work patterns, and transportation links. It is acknowledged that some areas of Mid Sussex and Horsham districts are also related to the travel to work, or migration pattern of other towns unable to meet their housing needs, such as the links between the southern areas of Mid Sussex and Brighton. Whilst the totality of unmet needs in the wider area could not be accommodated, Mid Sussex and Horsham are working to maximise

¹⁶ LP079: Crawley Strategic Housing Land Availability Assessment (2014) CBC

appropriate, sustainable housing delivery, and have to take these overlapping needs into account. The Sustainability Assessment that Mid Sussex has undertaken indicates that any supply in excess of local need in Mid Sussex should be prioritised to those which have the strongest economic and functional links with Mid Sussex¹⁷. The Inspector's Initial Findings from the Horsham Examination¹⁸, in which CBC took part to explain its development constraints, recognised the strong link between the three authorities in the NWS HMA and that Horsham was well placed to meet some of Crawley's needs. The Inspector acknowledged that a small allowance could be made to meet Brighton's need but that the links were less clear with this different HMA.

- 1.2.8 The three districts are also working together to understand infrastructure constraints in the NWS HMA, some of which are currently constraining further housing allocations beyond currently planned growth, because appropriate solutions have not yet been identified, and funding and delivery mechanisms resolved. CBC's response to the Airports Commission's consultation (February 2015) emphasises future infrastructure needs to support additional housing beyond current levels of planned growth, particularly roads, rail, education, health and sewage treatment, and these issues are echoed in responses from Mid Sussex, Horsham and West Sussex. Further joint work is being progressed to develop this understanding, identify solutions and funding sources, which are important for growth with or without a second runway.
- 1.2.9 Therefore, this important work is unlikely to be resolved within these Plan periods, due to differing work programme timetables for emerging evidence. However, as Crawley continues to be physically constrained with its tight administrative boundaries and the safeguarding of land for a potential runway development at Gatwick Airport, the land supply position for the borough remains the same. Opportunities to ensure the minimum figure set out within Policy H1 of the Local Plan is met, and potentially exceeded if possible, continue to be positively explored and will be supported by the implementation of the Policies throughout the Plan period. Negotiations continue with neighbouring authorities regarding housing provision and to pursue the delivery of sites close to Crawley's boundaries, or on transportation links to the borough's Main Employment Areas, where they constitute sustainable development and can be supported by adequate infrastructure provision.

¹⁷ LP139: Sustainable Assessment of Cross-Boundary Options for the Mid Sussex District Plan, para 6.14-6.15 (2014) LUC

¹⁸ Horsham District Planning Framework Inspector's Initial Findings, Paras 13–15 (December 2014) Inspector Geoff Salter

Other legal compliance matters

1.3 Is the CBLP in general accordance with the Council's Statement of Community Involvement?

- 1.3.1 The CBLP has been prepared in conformity with the council's Statement of Community Involvement¹⁹. This is detailed in full in the council's Consultation Statement²⁰, and its full set of Appendices 1 – 6.
- 1.3.2 Details of each stage of the early engagement consultations were published in documents following each consultation:
- LP025: Site Allocations Consultation Reports (2013) CBC
 - LP026: Preferred Strategy Consultation Report (2013) CBC
 - LP027: Local Plan (Crawley 2029) Consultation Report (2012) CBC
- 1.3.3 The Consultation Statement summarises how comments received at each stage of the Local Plan's preparation have been taken into account and influenced the evolution of the strategy, policies and land allocations when considered against the technical evidence base and national guidance.

¹⁹ LP038: Getting Involved... Crawley's Statement of Community Involvement (2011) CBC and LP039: Getting Involved... in planning: An appendix to Crawley's Statement of Community Involvement (2011) CBC

²⁰ LP004: Crawley Local Plan Consultation Statement (November 2014) CBC

1.4 Has the CBLP emerged from an open and transparent process that demonstrates how and why the preferred strategy was selected, in consultation with the public and other stakeholders?

- 1.4.1 Two initial stages of 'Issues and Options' consultation were undertaken in the preparation of the CBLP. In 2009, the Core Strategy Review commenced with a stakeholder workshop and the issuing of 12 Topic Papers, each identifying a specific theme for detailed consideration. These Topic Papers were updated for the 2012 Crawley 2029 Local Plan Issues and Options consultation to reflect the changes to national legislation and policy and local circumstances over that time. The Topic Papers helped to ensure the questions and options the council was posing were based on informed and realistic opportunities, whilst allowing full input into decisions being made at the later stages of Plan preparation.
- 1.4.2 The Issues and Options consultation undertaken in January – March 2012 sought to engage with the residents, businesses and visitors of Crawley as widely as possible, including 'hard to reach' groups. Engagement was also carried out with stakeholders, including infrastructure providers, neighbouring authorities and technical bodies. The details of this are set out in the Consultation Statement²¹ and the Crawley 2029 Consultation Report²². The outcomes of the Issues and Options consultation directly fed into the drafting of the Crawley 2030 Vision and the Local Plan Objectives from which the preferred strategy was developed.
- 1.4.3 Appendix E and Appendix F of the Sustainability Report²³, accompanying the CBLP, set out the options considered for the vision, strategic spatial strategy and policies within the Plan; assess each of these against the Sustainability Objectives; and explain why the chosen option was the one taken forward in the CBLP.
- 1.4.4 The preferred strategy document was consulted upon during autumn 2012. This document included the council's Vision, Local Plan Objectives and spatial strategy along with a full set of chapters and policies and an associated Local Plan Map showing the land designations and allocations being proposed. It included feedback from the Issues and Option consultation and sought to put this into the context of the preferred strategy being pursued. It also clearly showed the implications of the proposed land allocations and designations on a neighbourhood-by-neighbourhood basis to help local residents engage with the emerging Plan. The responses from all previous stages of consultation fed into the continual evolution and development of the submission Local Plan.
- 1.4.5 At every stage of public consultation the full evidence base prepared to date was published alongside the Local Plan documents, to ensure full, informed engagement could take place.
- 1.4.6 In addition, engagement into the Local Plan preparations was not restricted to the formal periods of consultation and detailed technical evidence was secured through

²¹ LP004: Crawley Local Plan Consultation Statement, p.9-11 (2014) CBC

²² LP027: Local Plan (Crawley 2029) Consultation Report (2012) CBC

²³ LP003: Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment (2014) CBC

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

ongoing liaisons with stakeholders, neighbouring authorities and Prescribed Bodies throughout the development of the Plan's strategy and policies, through a combination of meetings, emails/letter correspondence and telephone conversations²⁴. These have culminated in representations of support for many policies from partners at submission publication stage and through prepared Statements of Common Ground and agreed Position Statements.

²⁴ For example: Environment Agency; WSCC – highways authority, ecology, archaeology, drainage, education; NHS/CCG; Gatwick Airport; Neighbouring Authorities; landowners & developers; business groups; Gypsy & Traveller communities; Sport England; Network Rail; Metrobus; Thames Water; and Southern Water.

1.5 Has the CBLP been the subject of suitably comprehensive and satisfactory Sustainability Appraisal, Strategic Environmental Assessment and Appropriate Assessment under the Habitats Regulations?

1.5.1 The Sustainability Report²⁵ was submitted alongside the CBLP as a core document to support the Plan in its examination. This has been prepared in accordance with the legislative requirements (set out in Table 2.1, page 13, of the submitted Report). In addition, the Plan is supported by a Crawley Habitat Regulations Screening Report²⁶.

1.5.2 The Sustainability Report combines the two separate, but similar, processes of Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA) for the preparation of the Local Plan. The processes are iterative, and at each stage of the Plan-making an appropriate level of SA/SEA has accompanied the emerging Plan, inviting comment:

- LP029: Sustainability Appraisal of the Local Plan Preferred Strategy Additional Sites Consultation Document (2013) CBC
- LP030: Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment Draft Sustainability Report for Consultation with Local Plan Preferred Strategy (2012) CBC
- LP031: Sustainability Assessment Scoping Report (2011) CBC
- LP032: Crawley 2029 Local Plan Issues & Options Topic Papers – Topic Paper 12: Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment (2012) CBC
- LP033: Shaping the Future of Crawley – Core Strategy Review Topic Papers – Topic Paper 13: Sustainability Appraisal/Strategic Environmental Assessment and Habitat Regulations Assessment (2009) CBC.

1.5.3 The CBLP takes full account of the outcomes of the SA/SEA, through the decisions made on the chosen options for the strategy and each of the Policies. The Plan highlights the relationship between the two documents in Appendix B, which sets out the Sustainability Objectives and replicates the Local Plan Policies Sustainability Appraisal Overview table taken from the Sustainability Report²⁷; and, in Appendix C of the CBLP, the Local Plan Objectives are assessed against the Sustainability Objectives.

1.5.4 The Habitat Regulations Screening Report²⁸ concluded that the possible effects of the Plan will not have a significant adverse impact on the European Sites considered, and the Transport Modelling Stage 1 study²⁹ looked at the potential impacts of transport created by developments planned in the CBLP on the Ashdown Forest. Paragraph 3.7.11 of this confirmed that the strategic development options within

²⁵ LP003: Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment (2014) CBC

²⁶ LP009: Crawley Submission Local Plan Habitat Regulations Screening Report (2013) CBC

²⁷ LP003: Crawley Borough Council Sustainability Appraisal/Strategic Environmental Assessment, p30 (2014) CBC

²⁸ LP009: Crawley Submission Local Plan Habitat Regulations Screening Report (2013) CBC

²⁹ LP119: Crawley Transport Modelling Stage 1, Section 3.7 (2012) Amey Consulting

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

Crawley would not cause significant traffic flow impacts, or reductions in air quality, on routes through the Ashdown Forest. These conclusions were supported by correspondence from Natural England (email dated 29/11/13) – attached in Appendix D.

1.6 Has the CBLP been prepared in accordance with the Council's Local Development Scheme (LDS)? Is there sufficient recognition in the LDS of the need to review the Plan following the Government's decision on a second runway at Gatwick airport?

1.6.1 The council's updated Local Development Scheme³⁰ (LDS) was submitted alongside the CBLP. The LDS was initially agreed by Cabinet on 5 June 2013 to reflect the anticipated timetable for preparation of the Local Plan at that time. This took into account the substantial changes, at local, regional and national levels, to the planning system and context in which the Plan was being prepared, since its commencement as a Core Strategy Review (which had progressed under the adopted 2008 LDS). Updates to this were subsequently agreed by the Portfolio Holder for Planning and Economic Development, through the council's Scheme of Delegation, in July 2014 and November 2014; although the dates of the Local Plan programme were not amended during 2014. At each stage the most up-to-date version of the LDS was published on the council's website. Table 1.2 below sets the timetable of the Local Plan preparation as set out in the LDS against that which has been achieved. The timetables established in the LDS' agreed by the council are set out in Appendix E.

Table 1.2 Local Plan Timetable against adopted LDS Targets

Adopted LDS	Stage of LDS	LDS Requirement	Stage of Local Plan	Date Achieved
2014 (Submitted)	Total Production Period	January 2008 – October 2015		January 2008 –
2008	Target Date for Non Statutory Consultation (Regulation 25)	May – June 2009	Core Strategy Review Issues and Option	May 2009
			Issues and Options Consultation	19 January – 1 March 2012
			Preferred Strategy Consultation	22 October – 3 December 2012
2013	(Regulation 18)	Site Allocations Consultation: May – June 2013	Site Allocations Consultation	3 June – 1 July 2013
2014	Target Date for Proposed Submission Period for Representation (Regulation 19)	September – October 2014	Submission Consultation	1 September – 13 October 2014
	Target Date for Submission	November 2014	Submission	26 November 2014
	Target Date for Pre- Examination Meeting	January 2015	Pre-Examination Meeting	N/A
	Target Date for start of hearing sessions	March 2015	Start of Hearing Sessions	17 March 2015
	Target Date for receipt of Inspector's Report	June 2015	Receipt of Inspector's Report	

³⁰ LP040: Crawley Borough Council's Local Plan Local Development Scheme 2013 – 2016 (November 2014) CBC

Issue: Whether the plan complies with the legal requirements of the 2004 Act and the 2012 Regulations.

Adopted LDS	Stage of LDS	LDS Requirement	Stage of Local Plan	Date Achieved
	Target Date for Adoption and Publication	Cabinet & Full Council: September – October 2015 Adoption: October/November 2015	Adoption	

1.6.2 Paragraphs 1.6 and 1.7 of the LDS explain the implications of future decisions made regarding Gatwick Airport for the Local Plan, stating clearly that a government decision on the location of new runway capacity will mean some review and assessment of the Local Plan will be necessary. It also states that the decision will trigger an immediate review of the LDS. The Monitoring and Review section of the Document Details for the CBLP³¹ further confirms the need for a Local Plan review following a government decision on the future runway capacity of Gatwick Airport.

1.6.3 Topic Paper 1³² explains in detail the relationship of the future of the airport with the development potential of the borough, and concludes that for each of the three scenarios identified in relation to decisions made for the airport (i.e. a second runway; a single runway with continuation of safeguarded land; or a single runway and removal of safeguarded land) the implications will lead to some review and assessment of the CBLP being necessary. This is reflected in paragraphs 1.38-1.43 of the CBLP³³ which acknowledge the implications on monitoring and review of the Plan following any future decisions regarding Gatwick Airport being made by government. It is considered the level of detail provided in the LDS is sufficient for clarity of the council’s intentions.

³¹ LP001: Crawley Borough Submission Local Plan, p9-10 (September 2014) CBC

³² LP010: Topic Paper 1: Future of Gatwick Airport & Local Plan Review (2014) CBC

³³ LP001: Crawley Borough Submission Local Plan, p9-10 (September 2014) CBC