

# STATEMENT OF CONSULTATION

August 2015



This document has been prepared to demonstrate the Crawley Borough Local Plan's compliance with:

- ⇒ The Town and Country Planning (Local Planning) (England) Regulations 2012
- ⇒ "Getting Involved" – the adopted Statement of Community involvement
- ⇒ "Getting involved... in planning" – An appendix to the adopted Statement of Community Involvement

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## 1. Introduction

- 1.1. This document shows that Crawley2030, the new Local Plan for Crawley, has been prepared in accordance with the adopted Statement of Community Involvement (SCI) and complies with relevant legislation and regulations.
- 1.2. The Planning and Compulsory Purchase Act 2004 S.19 (3) states: “In preparing the other local development documents the authority must also comply with their statement of community involvement” (SCI). “Getting Involved...”, and its appendix “Getting Involved... in planning”, form Crawley’s adopted SCI. These documents outline that the council is committed to effective community engagement, and seeks to use a wide range of methods for involving the community in the plan making process. This document explains how the Local Plan has been prepared in accordance with the SCI.
- 1.3. The Town and Country Planning (Local Planning) (England) Regulations 2012 came into force on 6th April 2012.
- 1.4. This statement is made pursuant to Regulation 22 (c) of The Town and Country Planning (Local Planning) (England) Regulations 2012, which requires:

**22.—(1)** The documents prescribed for the purposes of section 20(3) of the Act are—

(c) a statement setting out—

- (i) which bodies and persons the local planning authority invited to make representations under regulation 18,
- (ii) how those bodies and persons were invited to make representations under regulation 18,
- (iii) a summary of the main issues raised by the representations made pursuant to regulation 18,
- (iv) how any representations made pursuant to regulation 18 have been taken into account;
- (v) if representations were made pursuant to regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- (vi) if no representations were made in regulation 20, that no such representations were made;

(d) copies of any representations made in accordance with regulation 20; and

(e) such supporting documents as in the opinion of the local planning authority are relevant to the preparation of the local plan.

- 1.5. By fulfilling Regulation 22 (c), this statement is also made pursuant to Regulation 18 and Regulation 20.
- 1.6. A number of consultation periods have been held throughout the preparation of the new Local Plan. These periods have been undertaken in line with Regulations 18 and 19 of the 2012 Local Planning Regulations, and are outlined in the table below:

<b>Consultation Period(s)</b>	<b>When did it take place?</b>
<b>Early Engagement Stage (Regulation 18)</b>	
Core Strategy Review Consultation	11 May 2009 - 22 June 2009
Issues & Options Consultation	19 January 2012 – 1 March 2012
Preferred Strategy Consultation	2 October 2012 – 3 December 2012
Site Allocations Consultation	3 June 2013 – 1 July 2013
<b>Publication Stage (Regulation 19)</b>	
Submission Consultation	1 September 2014 – 13 October 2014

- 1.7. This document looks at all of the consultation periods and shows how the Plan has evolved throughout its formation and been influenced by the responses received through public engagement and consultation.
- 1.8. It should be noted that this report sets out those representations made to Crawley Borough Council during formal consultation periods held under Regulation 18 and 19. A number of representations were received directly outside of the consultation periods outlined in paragraph 1.6 and therefore are not included within this report. These representations were incorporated as far as possible into the Local Plan as it developed in line with the adopted Statement of Community Involvement. Ongoing dialogue has taken place throughout the Plan's preparation with neighbouring authorities, infrastructure providers, and key stakeholders including the Environment Agency and the Highways Authority, as well as landowners and developers.

## 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:

### **Involve**

#### **Stage 1 – early engagement**

Gather evidence (independent studies and advice)

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, therefore any consultations that occur at this stage satisfied both the requirements of the SCI and Regulation 18.

## **Core Strategy Review Consultation**

- 2.3. Crawley's Core Strategy was adopted in November 2007, and then revised in October 2008. The Core Strategy provides the spatial vision, objectives and development strategy for Crawley up to 2026.
- 2.4. In 2009, a six-week non-statutory consultation period ran from 11 May till 22 June on the Core Strategy Review. This was brought about for two reasons:
- To bring the Core Strategy's housing figures in line with the South East Plan;
  - To review the Plan's position on Gatwick Airport.

### What were the consultation's aims?

- 2.5. The consultation's aims were:
- To conduct the consultation in line with the Statement of Community Involvement;
  - To provide a robust footing from which a Core Strategy Review Preferred Strategy could be prepared.

### Who we consulted?

- 2.6. Those registered on Crawley Borough Council's Local Development Framework database were consulted via post and email. These included a number of statutory consultees, developers, stakeholders, interest groups, and residents.
- 2.7. A full list of those consulted can be found in Appendix 1 of this report.

How did we conduct the consultation?

2.8. The council published Topic Papers on each of the key issues to be covered in the Core Strategy Review. These were circulated to consultees via email and post. The Topic Papers covered the following:

- Objectives & Visions;
- Climate Change and Sustainability;
- Design and Heritage;
- Air, Noise and Flooding;
- Housing;
- Employment;
- Town Centre Growth and Retail;
- Transport;
- Gatwick;
- Countryside;
- Open Space, Recreation, Leisure and Greenways;
- Community Facilities, Services and Infrastructure.

2.9. A Stakeholders' Workshop was held on Tuesday 19 May. Representatives from a range of organisations and groups participated in a series of discussions during which useful comments were made on the issues highlighted in the Topic Papers.

What were we told, and how did we address what we were told?

2.10. The key findings from the consultation are set out below:

- In total, the council received representations from 59 respondents, of which 24% were submitted online;
- The majority (although not all) were submitted by the statutory consultees and key stakeholders who had been the main focus of this consultation. These included the South East England Partnership Board (SEEPB), the Government Office for the South East (GOSE), all adjacent county and district councils, the Highways Agency and some of the utility providers;
- A number of respondents promoted areas of land (for both residential and commercial uses), which they hope to be allocated through the Core Strategy Review;
- Nine responses were received from local residents and their main concern was the amount of housing proposed in Crawley and the implications for the open spaces within the town.

2.11. Full representations and officer responses can be found in Appendix 1 of this report. The key messages are set out below:

<b>Main Issues</b>	<b>How this was taken into account?</b>
There was some debate over the level of housing to be provided.	At this time the housing target for the borough was set by the South East Plan (SEP). Crawley's land constraints meant there were several options put forwards. The situation changed dramatically with the revocation of the SEP so the findings of this consultation were taken into account as the establishment of our own locally set housing target was progressed.
The expansion of Gatwick Airport and a second runway divided opinion.	This matter is being considered at the national level and the Local Plan is not in a position to make the decision on this matter. The decision will be made by the government in light of recommendations in the Airports Commission's final report. The council is currently required to safeguard an area of land to the south of the airport.



Main Issues	How this was taken into account?
The preservation of open space within the town appeared to be a key priority for local people.	As a result of this suitable designations for the preservation of open spaces were investigated. Policies relating to Structural Landscaping and Local Green Space among others such as Green Infrastructure have been developed to ensure open spaces retain their importance in relation to the character of the town. A detailed study was also undertaken at a later stage to ensure any open space allocated for development was surplus to requirement or could be clearly justified when balancing demands for land use.
The need to be in conformity with the regional plan was made clear.	With the revocation of the SEP this is no longer required. However, the Duty to Cooperate ensures that the Plan has been developed within the borough's wider, strategic and cross-boundary context.
Due to the economic climate, the need to ensure viability is central to all policies was highlighted.	Policies were prepared in a positive way with viability issues always in mind. The submission Local Plan has been viability tested prior to publication.

- 2.12. It was initially intended that these views would contribute to the formulation of the council's Core Strategy Review Preferred Strategy, which was planned to be published for consultation in late February 2010.
- 2.13. For a number of reasons, the Core Strategy Review Preferred Strategy was delayed. This was partly due to continued uncertainty around the North East Sector and the land requirements of Gatwick Airport. The change of central government in May 2010 brought further uncertainties as reforms to the planning system were anticipated.
- 2.14. As a result of the change in central government and the changes they introduced the Core Strategy Review evolved into work on the new Local Plan. However, the comments received at this stage continued to be relevant and fed into the Local Plan Preferred Strategy alongside those made at the next stage of early engagement consultation.

## Issues & Options Consultation

- 2.15. As a result of the change of government in 2010, a number of changes to the planning system occurred. The main changes were:
- The **Localism Act 2011** made a series of provisions regarding town and country planning. Most importantly it placed the emphasis upon the local communities to guide planning policy and introduced the Duty to Cooperate committing the council to constructive and effective joint working with other authorities and bodies on strategic issues crossing administrative boundaries. As a result of this Act, Crawley Borough Council updated its Statement of Community Involvement in December 2011;
  - The **National Planning Policy Framework (NPPF)** was introduced in March 2012. This replaced most National Planning Policy and the Local Development Framework system. The NPPF highlighted the importance of local communities in the planning system and instigated a new Local Plan based system.
- 2.16. To reflect these changes, and the time passed since the 2009 Core Strategy Review consultation, a further six week consultation period was held from 19 January 2012 until 1

March 2012 on the Issues & Options for the new Local Plan (then titled Crawley2029).

- 2.17. A report on this consultation was prepared and published after this consultation. This document is titled Issues & Options Consultation Report and can be found within the submission library (Local Plan examination document reference: LP027). It is accompanied by a document containing the appendices.

#### What were the consultation's aims?

- 2.18. The aims of the consultation were:
- To conduct the consultation in line with the Statement of Community Involvement;
  - To get an early indication of issues of importance to those living and working in Crawley, in terms of Crawley's future development up to 2029;
  - To afford those living and working in the borough the opportunity to get involved early in the forward planning process;
  - To try to take a more innovative approach to strategic thinking which would highlight perceptions and aspirations, to make for a more meaningful outcome with which people could identify;
  - To share with stakeholders and residents some of the dilemmas facing the council at the current time and into the future;
  - For the council to understand the priorities of those living and working in Crawley;
  - For the council to effectively use this qualitative information when planning Crawley's future up to 2029.

#### Who we consulted?

- 2.19. Those registered on Crawley Borough Council's Local Plan consultee database were consulted via post and email. These included a number of statutory consultees, developers, stakeholders, interest groups, and residents.
- 2.20. A full list of those consulted can be found in Appendix 2 of this report.
- 2.21. To reach residents, businesses and visitors to Crawley, in addition to those on our database:
- A Statement of Representation Procedure and Notification of Public Consultation was placed in the Crawley Observer on 25 January 2012;
  - Crawley's residents were consulted through:
    - ⇒ the use of local press releases;
    - ⇒ posters in the town's neighbourhood notice boards;
    - ⇒ the council's magazine "Crawley Live";
    - ⇒ the council's website, with a dedicated shortcut: [www.crawley.gov.uk/crawley2029](http://www.crawley.gov.uk/crawley2029);
    - ⇒ social media;
    - ⇒ a promotional video by the Portfolio Holder for Planning and Economic Development which was available on the council's website and the video-sharing website YouTube; and
    - ⇒ within the programme and a half-time announcement at the Crawley Town Football Club home match on 11/02/12.
  - almost 700 individuals were engaged with in detail via workshops/neighbourhood drop-in events;
  - 513 Crawley residents were engaged via the WSCC panel.

#### How did we conduct the consultation?

- 2.22. The consultation was aimed at the general public as well as stakeholders. It was based around a series of Topic Questionnaires, each covering a different topic theme.

- 2.23. The topic themes were:
- Your Vision;
  - Economy;
  - Housing;
  - Green Spaces;
  - Your Neighbourhood;
  - Growth.
- 2.24. In addition, the 2009 technical topic papers were updated and re-issued highlighting the current position covering the same issues as had been considered previously for the borough to be addressed by the Local Plan. Additional evidence base documents were published alongside the consultation to provide further information for comments to be based upon: including the Strategic Housing Market Assessment (2009), Locally Generated Housing Needs (2011) and Employment Land Review (2009/10).
- 2.25. A number of events were held. These comprised:
- Debate at the ‘State of the Borough’ event on 24 January 2012;
  - A community workshop was held on 26 January 2012 for invited, targeted<sup>1</sup> groups;
  - A travelling drop-in session and exhibition at every neighbourhood parade, Tesco, County Mall shopping centre, & K2 leisure centre;
  - Other exhibitions were held at times which coincided with other events/activities.
- 2.26. Over the course of the consultation:
- A total of 2,500 flyers were distributed;
  - Approx 350 paper questionnaires were distributed.

What were we told, and how did we address what we were told?

- 2.27. In total 538 completed questionnaires were returned across the six themes (Vision, Housing, Green Space, Neighbourhoods, Growth, Economy). This represents at least 129 individuals, although this is most probably in the range of 150 – 160, although exact numbers are not known because respondents could complete one to six questionnaires, or any number in between. 60% of the respondents used the paper questionnaires and 40% responded online.
- 2.28. In addition, 14 stakeholders responded from the workshop and 120 responses were gathered through the State of the Borough debate. 36 detailed responses were received directly to the Forward Planning team, primarily from technical and statutory stakeholders.
- 2.29. Comments received through this consultation were varied. However, distinctive messages were received. Full representations and officer responses can be found in Appendix 2 of this report. The key messages are below:

Main Issues	How this was taken into account?
Modest development of the town preferred: <ul style="list-style-type: none"> <li>• Ensure quality of life for local people is maintained or improved;</li> <li>• Don't build too many houses and keep them small;</li> <li>• Better use of empty buildings</li> </ul>	Whilst this is the preferred route from consultation, it is important for the Local Plan to be positively prepared and seeks to meet all needs. However, due to the tight administrative boundary there is limited space for development to accommodate the borough's needs.  Many policies aimed at ensuring the quality of life have been incorporated into the Local Plan.  Following on from the comments on housing size, the council undertook updates to the Strategic Housing Market

<sup>1</sup> These included ‘harder to reach’ groups in addition to community forums already engaged in the planning process.

Main Issues	How this was taken into account?
<p>for housing;</p> <ul style="list-style-type: none"> <li>Fears that existing infrastructure problems will be exacerbated; e.g. parking, traffic, health and hospital facilities, schools.</li> </ul>	<p>Assessment (SHMA) in 2012 and 2014 that has identified the greatest need is for 1, 2 &amp; 3 bed properties, and is incorporated into the submission Local Plan Policy H3.</p> <p>The fears that existing infrastructure problems will be exacerbated will be taken account of during the planning application process, reinforced by the policies within the submission Local Plan Policies IN1 – IN7. The Infrastructure Plan has also been prepared to ensure there is sufficient infrastructure capacity to meet the needs of new development over the life of the Local Plan.</p>
<p>Don't build on green space – <i>all</i> green space is valued.</p>	<p>Building upon the previous consultation responses, policies relating to Structural Landscaping and Local Green Space among others such as Green Infrastructure were incorporated to ensure open spaces retain their importance. A detailed study was also commissioned to ensure any open space allocated for development was surplus to requirement.</p>
<p>Focus on local people – families especially; and don't forget increasing numbers of older people.</p>	<p>The needs of local people have been taken into account as the Plan has progressed. Space standards to maintain quality of life alongside accessibility standards have been incorporated to ensure developments adapt to the changing needs of people throughout their lives.</p> <p>The SHMA has also assessed the needs of the borough to ensure that future housing provision reflects the needs of local people over the Plan period.</p>
<p>Maintain what is already here, keep it clean and tidy rather than concentrate on new development.</p>	<p>This matter was raised a number of times. However, as the Local Plan is a development plan document it has limited scope for maintenance. The council has taken these comments on-board corporately. That said a number of policies do seek to ensure that new development does not conflict with the established town, its neighbourhood principle and greenery.</p>
<p>Retain the “likes” – compact town; convenience; leisure facilities; parks and open spaces; progressive town; diverse.</p>	<p>The retention of the compact urban form of Crawley is a pivotal priority in the Plan. All of the aspects mentioned here have been given a central role as the Plan progressed. The neighbourhood principle underpins many policies within the Local Plan, this will ensure that the town remains compact, with facilities serving local needs.</p>
<p>Better range of shops in Town Centre and regenerate Queens Square; mix of activities to support retail to make it vibrant.</p>	<p>The council explored a number of ways that this can be achieved through planning policy. The Town Centre has its own designation. The regeneration of Queens Square would be supported by Plan policies; this is a priority of the council at a corporate level.</p>

Main Issues	How this was taken into account?
Retain neighbourhood principle and parades and encourage more diversity of retail outlets – limit takeaways and betting shops.	<p>The neighbourhood principle and parades remain central to the Local Plan.</p> <p>The council took the comments received and updated the Retail Capacity Study in 2013, from this effective NPPF-compliant policies have been put in place. Whilst the council recognised the overwhelming opinion on the matter of takeaways and betting shops this is not a strategic issue and would be dealt with on a case-by-case basis.</p>
Improve the “image” of Crawley.	<p>The Plan progressed from this consultation to establish a solid vision for Crawley that seeks to ensure Crawley will become a “premier” town.</p>
More interesting architecture – heritage and design to be a priority.	<p>Crawley, being predominantly built at the same time, has a particular vernacular. The Plan seeks to preserve its heritage whilst ensuring future developments are of high quality design and are in keeping with the surrounding area. Policy CH3 seeks to achieve this by setting design considerations for all new development.</p>
Mixed views on % of social housing – no clear preferences.	<p>Further work was undertaken to establish the correct mix of housing; including the SHMA update and viability study.</p>
Mixed messages on second runway Gatwick Airport.	<p>This matter is being considered at the national level and the Local Plan is not in a position to make the decision regarding the potential future expansion of the airport. The decision will be made by the government, following its consideration of the Airports Commission final report. The council is currently required to safeguard an area of land to the south of the airport. The Local Plan, therefore, has been prepared in the context of a single runway, two-terminal airport with growth capacity up to 45million passengers per annum by 2030, and a continuation of land safeguarded for a potential second wide-spaced runway. The Local Plan does, however, set out the anticipated scenarios with regards to the future decisions for the airport and the implications these have for the Plan and need for possible review.</p>
Need to encourage greater diversity of industry – less restrictions on use of Manor Royal.	<p>Following on from these comments an evidence base was created that identifies demand for a range of employment generating uses in Crawley, placing a particular focus on the significant need for business floorspace. As there is limited available land to accommodate this demand, the Local Plan seeks to promote Manor Royal as the premier destination for business development, whilst encouraging flexibility for a wider range of employment uses at other Main Employment Areas. The Local Plan does, however, provide flexibility at Manor Royal for non-business uses that would complement the overall business function at Manor Royal.</p>

- 2.30. All of the key messages outlined above, alongside the responses from the Core Strategy Review, shaped the Preferred Strategy Local Plan.
- 2.31. Critically, the Crawley 2029 Vision was directly prepared utilising the feedback from the consultation questionnaires. This Vision was agreed as a corporate vision for the town, including non-land use aspirations, at the Cabinet/Corporate Management Team meeting held on 29 May 2012. This provided a clear steer from which to build the detailed proposed objectives, proposals and policies for the preferred strategy.

## **Preferred Strategy Consultation**

- 2.32. The Preferred Strategy Local Plan (Local Plan document library reference: LP028) was prepared taking into account the most up-to-date evidence base at that time and feedback gained from the Core Strategy Review (2009) and the Issues and Options (2012) consultations.
- 2.33. A six-week consultation period ran from 22 October 2012 till 3 December 2012 on the Preferred Strategy Local Plan document and its supporting evidence base documents.
- 2.34. A report on this consultation was prepared and published after this consultation period. This document is titled Preferred Strategy Consultation Report and can be found within the examination library (Local Plan document library reference: LP026). It is accompanied by three appendices: Appendix 1 - Communications & Advertising Materials; Appendix 2 - Verbatim Questionnaire Responses; and Appendix 3 - Verbatim Representations.

### What were the consultation's aims?

- 2.35. The consultation's aims were:
- To conduct the consultation in line with the Statement of Community Involvement;
  - To verify that the strategy outlined in the Preferred Strategy Local Plan had support, and provide people the opportunity to raise queries and objections;
  - To afford those living and working in the borough the opportunity to be involved in the forward planning process;
  - To share with stakeholders and residents some of the dilemmas facing the council at the current time and into the future;
  - To gather qualitative responses to the Preferred Strategy Local Plan that could help inform amendments to establish the submission Local Plan.

### Who we consulted?

- 2.36. Those registered on Crawley Borough Council's Local Plan consultee database were consulted via post and email. These included a number of statutory consultees, developers, stakeholders, interest groups, and residents. Those registered on the council's alert system were also notified. This totalled 527 contacts. The wider public were also encouraged to respond to the consultation in a variety of ways, see paragraph 2.41.
- 2.37. A full list of those consulted directly can be found in Appendix 3 of this statement.
- 2.38. A Statement of Representation Procedure and Notification of Public Consultation was placed in the Crawley Observer on 31 October 2012.

### How did we conduct the consultation?

- 2.39. As well as accepting detailed direct representations, a questionnaire was produced to enable the general public to submit their thoughts. This concentrated around the proposed policies and whether they agree/disagree with the preferred strategy. Approximately 1000

questionnaires were circulated over the consultation period; including 500 paper questionnaires which were included in regular bills that were sent out by the council during this time to a random selection of residents.

- 2.40. A number of events were held directly engaging with local communities, held at key locations in the town: K2 Crawley, the town hall and County Mall, as well as attendance at Neighbourhood Forum meetings. Key groups were targeted including:
- businesses – through the Better Business Debate; and
  - youth – through the young person’s Question Time and Crawley’s Young Person’s Council.
- 2.41. The general public were informed of the consultation via public exhibitions, attendance of officers at local meetings, social media, newspapers, radio broadcast, posters, and an article in the council’s local magazine distributed to every household in Crawley. To heighten interest, different topics were chosen to highlight in the press and social media over the six week period.
- 2.42. The Preferred Strategy document included a section ‘Part 3: Crawley’s Neighbourhoods’ in which the combined implications of the Local Plan proposals were set out on a neighbourhood-by-neighbourhood basis. The preferred strategy Local Plan map extract for each neighbourhood was replicated alongside a summary about its current key characteristics; comments received from previous public consultations; environmental and heritage designations; and potential changes (including allocations and new designations). The Local Plan neighbourhood maps were used as exhibition handouts for interested residents and the neighbourhood extracts were available to download, individually, on the council’s website.

What were we told, and how did we address what we were told?

- 2.43. In total, 215 people took part in directly submitting responses to the consultation. 130 paper questionnaires were returned while 33 were completed online. 52 representations were received either by email or in hard copy from stakeholders, organisations and residents.
- 2.44. Full representations and officer responses can be found in Appendix 3 of this report. The key messages are below:

<b>Main Issues Raised</b>	<b>How this was taken into account?</b>
The quantity of housing to be delivered over the Plan period.	Due to Crawley’s constrained administrative boundary the submission Local Plan includes a supply-led housing figure to be delivered over the Plan period.
The location of housing, especially having more housing in the Town Centre.	Housing has been allocated where it is developable and deliverable. The Town Centre is now allocated as a broad location where housing applications will be supported. This is in addition to specific allocated sites in the town centre for mixed use development with a minimum number of anticipated residential units or for 100% residential development.

Main Issues Raised	How this was taken into account?
<p>Gatwick Airport and a possible second runway.</p>	<p>This matter is being considered at the national level and the Local Plan is not in a position to make the decision on this matter. The decision will be made by the government following recommendations in the Airports Commission's final report. The council is currently required to safeguard an area of land to the south of the airport. A partial or full review of the Local Plan is anticipated following the government's decision into UK airport runway expansion, depending upon the outcomes agreed and its implications for the Local Plan.</p>
<p>The loss of open and green space.</p>	<p>A study has been completed to assess the borough's open space provision and needs, and ensure a justified approach, balancing open space protection with providing for objectively assessed development needs, is taken in the submission Local Plan.</p> <p>Further to this other policies such as structural landscaping have been strengthened to ensure the visual appearance and character that the greenery offers is protected.</p>
<p>Achieving the correct mix of housing.</p>	<p>The 2014 SHMA update identified the housing types that have the greatest need; this was used to formulate Policy H3.</p>
<p>The impacts of the environmental policies in terms of viability, especially in relation to housing.</p>	<p>The submission Local Plan has been viability tested to ensure no policies will compromise the viability of developments.</p>
<p>Support for the neighbourhood principle.</p>	<p>A policy highlighting the importance of the neighbourhood principle has been incorporated into the Plan (CH1).</p>
<p>The need to balance the design of new development (which needed to be architecturally striking) with the heritage of the town.</p>	<p>Policy CH3 has been revised to ensure that the town can continue to development with high quality design that respects the existing character.</p>
<p>The importance of open space.</p>	<p>A series of policies highlighting the importance of local open space are included in the submission Local Plan (ENV1 – ENV5); other policies also address other aspects of open space (including design, character, accessibility, flooding and sustainability).</p>
<p>Supporting for protecting the other business parks as well as Manor Royal.</p>	<p>Whilst Manor Royal is Crawley's main business district, Policy EC2 in the submission Local Plan now identifies a number of areas that should be the focus of sustainable economic growth over the Plan period.</p>
<p>Support for limiting out of town retail development.</p>	<p>In line with the NPPF, EC7 in the submission Local Plan directs retail uses to the sustainable town centre location and requires a sequential test to be utilised if out of centre locations come forward.</p>



Main Issues Raised	How this was taken into account?
Support for most housing sites.	As a result of this most have been allocated unless other material considerations indicate they shouldn't.
Importance of getting the infrastructure right before development proceeds.	<p>Comments varied from roads to water supplies.</p> <p>One area in particular that was highlighted was the importance of Ifield Station; this is now included in Policy IN6.</p> <p>Water Stress and flooding are also specifically identified as well as more general infrastructure policies.</p>

- 2.45. The key messages outlined above, helped to shape the Site Allocations Consultation and the submission Local Plan.

### **Additional Site Allocations Consultation**

- 2.46. The Additional Site Allocations Strategy was prepared taking into account the current evidence base and feedback gained from the previous consultations. It was required as, based upon previous comments and new evidence, more sites were potentially available for development to help meet Crawley's needs.
- 2.47. A four-week consultation period ran from 3 June 2013 till 1 July 2013.
- 2.48. Several reports on the outcomes of this consultation were prepared and published (Local Plan document library reference: LP025). These included reports on the proposed Cemetery, Gypsy & Traveller Sites, Historic Parks & Gardens and Local Green Space, Housing Development, and an Overall Summary. These are supported by appendices that are split into two documents: Appendices A-D; and Appendix E.

#### What were the consultation's aims?

- 2.49. The aims of the consultation were:
- To conduct the consultation in line with the Statement of Community Involvement;
  - To gather public and stakeholder opinion as to whether the additional sites identified through further work should be included in the Local Plan;
  - To provide people the opportunity to raise queries and objections to the proposed and rejected sites;
  - To provide public, landowners and stakeholders the opportunity for the submission of additional and/or alternative sites to meet potential development needs;
  - To afford those living and working in the borough, as well as landowners, developers, and stakeholders the opportunity to be involved in the forward planning process.

#### Who we consulted?

- 2.50. Those registered on Crawley Borough Council's Local Plan consultee database were consulted via post and email. These included a number of statutory consultees, developers, stakeholders, interest groups, and residents. This totaled 458 contacts. A full list of those consulted can be found in Appendix 4 of this report.
- 2.51. A further 674 contacts on the Crawley Borough Council email alerts system were also notified of the consultation.

- 2.52. A letter was also sent directly to properties adjacent to the proposed allocations to notify them of the start of the consultation.
- 2.53. A Statement of Representation Procedure and Notification of Public Consultation was placed in the Crawley Observer on 31 May 2013.
- 2.54. Copies of the consultation questionnaire (see para. 2.52. below) were sent to 1,000 residents randomly selected through the billing system.

#### How did we conduct the consultation?

- 2.55. As well as accepting written representations, a questionnaire was produced and made available online as well as on paper to allow easier access. A hard copy of the questionnaire was sent to people who requested a survey. Hard copies of the survey were also available at both libraries and at the Town Hall.
- 2.56. The consultation was publicised via a briefing held with the local press at the beginning of the project. The press then followed the consultation during the four weeks with different elements being publicised each week. It was promoted through Twitter and the council's Facebook page. An article also appeared in Crawley Live. Emails were also sent out to those registered on the email alerts system as well as those on the Local Plan database.
- 2.57. Posters were also displayed across the town and site notices were located close to the sites proposed for allocation.

#### What were we told, and how did we address what we were told?

- 2.58. 2068 individuals submitted a completed online survey or paper questionnaire. Of these, 1,889 (91%) lived within Crawley, with the remaining 179 (9%) living outside the town. 96% of respondents completed the questionnaire as individuals, with only 1% representing an organisation. In addition to the questionnaires, 660 comments were received directly to the Forward Planning team via letters and emails from 200 individuals and organisations.
- 2.59. Three petitions were received in relation to:
- **the proposed cemetery site** (1,346 signatories: comprising 152 paper signatures and 1,194 e-signatures, submitted on 2 July 2013)  
Petition Statement *"Save Ewhurst Playing Fields from becoming a Cemetery. We, the undersigned, petition the Forward Planning Department at the Development & Resources Directorate of Crawley Borough Council.*
    - *We object to the proposal to change the use of Ewhurst Playing Fields to a Cemetery as described in the Crawley 2029: Additional Sites Allocation Consultation Documentation 3 June – 1 July 2013.*
    - *We believe that Ewhurst Playing Fields are more than sports pitches, they also offer attractive open green spaces, for local people to enjoy, and should remain so for the future";*
  - **the proposed allocation of Bewbush playing fields for housing sites** (284 signatures, submitted on 2 July 2013)  
Petition Statement *"To object to the Council's proposals for housing (and any other) development on Bewbush West Playing Fields and Breezehurst Drive Playing Fields. Furthermore, the Principal Petitioner has requested (in a covering letter but not on the signed petition pages) that in light of a complete lack of awareness of the local residents and communities, the consultation period for the proposals be extended, with further advertisement and public advertisement of the proposals";*

- **the proposed de-designation of Ifield Park as a Historic Park and Garden** (102 signatures): the details of the statement made are set out in Appendix 4: Early Engagement – Additional Sites Consultation, pages 584 - 586;
- In addition, a substantial number (606) of individually signed, identically completed questionnaires were submitted in relation to **the proposed reserve Gypsy and Traveller site at Broadfield Kennels** providing a collective view: one statement – this is set out in Appendix 4: Early Engagement – Additional Sites Consultation, pages 152 - 156.

2.60. Full representations and officer responses can be found in Appendix 4. The key messages are below:

Main Issues Raised	How this was taken into account?
<p>The Cemetery attracted a variety of responses including:</p> <ul style="list-style-type: none"> <li>• Inappropriate location;</li> <li>• Inappropriate loss of open space / playing fields;</li> <li>• Not large enough.</li> </ul>	<p>The cemetery allocation is not being taken forward as part of the Local Plan and further investigations are being carried out to find the most appropriate site.</p>
<p>Support for the designation of Local Green Space.</p>	<p>Ifield Brook Meadows and Rusper Road Playing Fields has been designated as a Local Green Space in the submission Local Plan.</p>
<p>Objection to the principle of provision of a Gypsy/Traveller site from residents. Support for the principle of provision of a Gypsy/Traveller site from the Sussex Traveller Action Group.</p>	<p>Whilst the view against providing a site for Gypsy and Traveller pitches was strong, the council has a legal obligation to provide site(s) to meet assessed needs. Therefore, a reserve site is included in the submission Local Plan.</p>
<p>There was marginally more support for the Broadfield Kennels Gypsy/Traveller Site (22%) than the Langley Walk Gypsy/Traveller Site (12%). However, a number of key planning issues were also raised in relation to the Broadfield Kennels site.</p>	<p>The Broadfield Kennels site is allocated in the submission Local Plan due to the level of physical constraints associated with the Langley Walk site. Wording in Policy H5 was prepared with the assistance of West Sussex County Council to ensure mitigation measures are adequate to address concerns raised in relation to impacts on highways infrastructure, biodiversity, the AONB and the country park.</p>
<p>Some felt that open spaces within the town weren't protected enough.</p>	<p>A combination of various policies within the submission Local Plan provides protection to open spaces that justify such protection, in line with national guidance. These include CH3, CH7, ENV1 and ENV4.</p>
<p>Local Green Space and Historic Parks and Gardens designations welcomed.</p>	<p>These allocations are in the submission Local Plan.</p>

Main Issues Raised	How this was taken into account?
<p>The loss of Historic Park and Garden designation was perceived to be aimed to encourage development in those locations</p>	<p>This was not the case: the evidence base had indicated that some areas no longer warranted the designation from a technical perspective, rather than the site was considered suitable for development.</p> <p>As no new or overriding evidence emerged through the consultation process it is maintained they should not be allocated in the Local Plan for their heritage value as a Historic Park and Garden.</p>
<p>Mixed views on housing sites:</p> <ul style="list-style-type: none"> <li>• Loss of playing fields/open space was not popular;</li> <li>• Breezehurst and Bewbush West were not popular allocations. However, there was a preference for smaller housing development on these sites and the retention of playing fields if they were to come forward;</li> <li>• Support for brownfield site allocations;</li> <li>• Support for some other sites being looked into in more detail, and the sites that require further work at the consultation stage;</li> <li>• Support from neighbouring authorities within Crawley's housing market area that Crawley is seeking every opportunity to maximise its housing land supply.</li> </ul>	<p>The council has made careful consideration in relation to which housing sites to include within the Plan.</p> <p>The loss of open space has been carefully investigated and only spaces that are surplus to requirement have been taken forward.</p> <p>Both the Breezehurst and Bewbush West (Henty Close) allocations are being taken forward in the Local Plan but with fewer houses than they could have accommodated so that some open space can be retained within the sites.</p> <p>Brownfield sites such as Goffs Park Depot have been included in the submission Local Plan following support from the consultation.</p> <p>The further sites have been looked into following the consultation. However, at this stage, none are considered to be deliverable or developable so have not been allocated in the submission Local Plan.</p>
<p>Concern around over-developing the town</p>	<p>Due to Crawley's compact nature and development requirements infill development is necessary. Protection policies have been put in place to ensure the town's character, appearance, and the welfare of its residents is retained.</p>

2.61. The key issues identified from this consultation, alongside previous consultations, helped to shape the submission Local Plan.

### 3. Publication Stage (Regulation 19)

- 3.1. The second stage of the council's adopted SCI is called "CONSULT" and closely corresponds to the expectations required by Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. An extract from the adopted SCI is below:

#### Consult

##### Stage 2 – publication

Draw upon evidence and feedback received at 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 6 week period. For Supplementary Planning Documents this will be a period of between 4 and 6 weeks.

Publicise consultation and ensure that all documents are readily available to view to make sure that everyone has sufficient opportunity to comment.

#### Submission Consultation

- 3.2. The submission Local Plan was prepared taking into account the evidence base and feedback gained from the previous consultations made under Regulation 18 and Stage 1 of the SCI.
- 3.3. A six-week statutory consultation period was undertaken from 1 September 2014 until 13 October 2014 in accordance with Regulation 19 and inviting representations to be made relating to the Local Plan in accordance with Regulation 20.
- 3.4. All advertising and communication materials used during this stage of consultation are set out in Appendix 5 of this Statement of Consultation.
- 3.5. Copies of all representations received during this stage of consultation are included within Appendix 6 of this Statement of Consultation.

#### What were the consultation's aims?

- 3.6. The consultation aims were:
- To conduct the consultation in line with the Statement of Community Involvement;
  - To inform people that the draft submission Local Plan and all of its supporting documents and evidence base have been published and made publically available;
  - To provide people with a final opportunity to make formal comments on the Local Plan to be considered by the Planning Inspector.

#### Who we consulted?

- 3.7. All those registered on Crawley Borough Council's Local Plan consultee database were consulted via post and email. These included a number of statutory consultees, developers, stakeholders, interest groups, local businesses and residents. In total approximately 1595 people were directly consulted.

- 3.8. A full list of those consulted can be found in Appendix 6 of this report.
- 3.9. A further 502 Contacts subscribed to the Crawley Borough Council email alerts system were also notified of the consultation at all stages.
- 3.10. Crawley's Conservation Area Committees were also informed throughout the submission consultation period.
- 3.11. A Statement of the Representations Procedure and Notification of Public Consultation was published in the Crawley Observer on 27 August 2014. This was also placed on the council website's Public Notices page.

#### How did we conduct the consultation?

- 3.12. The consultation provided the opportunity for the local community and key stakeholders to make representations on the proposed submission Local Plan, the Local Plan Map and the Sustainability Appraisal. All of the information relating to the Local Plan at the submission consultation stage was made publically available online directly using the shortcut [www.crawley.gov.uk/crawley2030](http://www.crawley.gov.uk/crawley2030) as well as through the council's website home page.
- 3.13. Representations could be made by using the council's online eform or by completing a paper representation form. Paper copies of the form were available at the Town Hall, Crawley Library and Broadfield Library, as well as online.
- 3.14. When making a representation people had to consider whether the Local Plan complied with legal requirements, the duty to cooperate and was sound. In order for people to understand these terms, a guidance note was prepared. This accompanied the representation form and was also made available at the Town Hall, Crawley Library and Broadfield Library, as well as online.
- 3.15. The Local Plan and all of its supporting documents were made available to view online on the council's website. Hard copies of all documents were also available to view at the Town Hall, Crawley Library and Broadfield Library.
- 3.16. E-mails and letters were sent to both statutory and general consultation bodies, as well as local residents and businesses to inform them of the start of the consultation on 1 September. This also included details of where to find the documents, and copies of the representation form and guidance note were enclosed, as well as information on how to make a representation.
- 3.17. Local Plan Updates were sent out to all people on the consultation database by post and email at regular intervals. In addition to the emails and letters sent out notifying the start of the consultation, an update was sent out with further details of the drop-in sessions on 22 September 2014 and another on 6 October 2014 informing people that they had one week left until the consultation period closed.
- 3.18. The general public were informed of the consultation at regular intervals via social media, newspapers and through frequent press releases. An article was published in the Crawley Live magazine, as well as an article on BBC Sussex. All communications and advertising materials used during this stage of consultation can be found in Appendix 5.

#### Drop-in sessions

- 3.19. Three public drop-in sessions took place: in Bewbush; Broadfield; and the Town Centre. These were run by an independent planning consultant on behalf of the council supported by the council's Community Development team and were organised to help local people formally engage in the planning process.

- 3.20. These sessions did not look at the content of the Local Plan, but explained the consultation process and provided information on how to make a formal representation on the Local Plan to be considered by the Planning Inspector.
- 3.21. After each session the Planning Consultant provided feedback, with an overview of the types of issues that were raised and advice that was given.
- 3.22. **Bewbush Centre:** Thursday 25 September 2014, 6.30-8.30pm.  
Five local residents attended the session with the majority of people seeking advice on their representation to the housing allocations in Bewbush and the lack of open space provision.
- 3.23. **Crawley Library:** Thursday 2 October 2014, 5-6.30pm and 7-8.30pm.  
14 people attended the session and a wide range of issues were discussed. A number of individuals representing local residents' associations and societies attended the session, many seeking similar advice on the best way to represent collective views. One of the groups were proposing to object to a housing site in Policy H2. They sought advice on the best approach to take for a collective view to be considered by the Planning Inspector. The Planning Consultant advised the group to submit one representation e.g. a statement of objection on behalf of the association, quoting the number of people who share the same view.
- 3.24. **Broadfield Youth and Community Centre:** Monday 6 October, 6.30-8.30pm.  
Four local residents attended the session with issues mainly focused on Policy H5 Gypsy, Traveller and Travelling Showpeople with the submission Local Plan's allocation for a reserve Travellers' site at Broadfield Kennels. The leader of the group previously objecting to this provision came along to talk through their proposed representation. Another person attended to gain advice on their representation to the housing allocation at Longley House, Southgate.

### Representations Received

- 3.25. Approximately 270 representations have been made to the Local Plan policies from 83 representors. The majority of representations were received from developers/landowners, and from formal technical stakeholders – these included:
- the Environment Agency;
  - Highways Agency;
  - Network Rail;
  - Gatwick Airport;
  - Thames Water;
  - Southern Water;
  - NHS Crawley CCG;
  - Sport England;
  - Natural England;
  - High Weald AONB Unit;
  - County councils and neighbouring authorities.
- 3.26. In total, 25 local residents responded and 5 responses were on behalf of wider local groupings: Tinsley Lane Residents Association, Ifield Village Association, The Ifield Society, Manor Royal Business District Limited and the Local Economy Action Group.
- 3.27. Policies which received the most representations included:
- Duty to Cooperate;
  - Local Plan Map;
  - Sustainable Economic Growth;
  - Manor Royal;

- Housing Provision;
- Key Housing Sites;
- Gypsy, Traveller and Travelling Showpeople Sites;
- Local Green Space;
- Development and Noise

Notable representations were also received on the affordable housing policy, development standards, district energy networks, infrastructure provision, and Gatwick Airport.

- 3.28. The main issues from the representations submitted are summarised by Policy below and full representations can be found in Appendix 6 of this document.



# Submission Consultation: Summary of Representations

(1 September - 13 October 2014)

## Crawley's Local Plan & Supporting Documents

Overall, a number of representations raised clear concerns regarding the uncertainty of a second runway at Gatwick Airport and the outcome of this decision on the future of Crawley and the status of the Local Plan. This issue proved to be a consistent theme throughout the representations, particularly in relation to Policy EC1, GAT1 and GAT2. Concerns primarily came from local residents, and landowners with sites in the safeguarded area.

Local residents and groups including Ifield Village Association and Ifield Village Conservation Area Advisory Committee (IVA/IVCAAC), Mr Peter Jordan, Mrs Jane Wilson, Mr Derek Meakings and Mr John Byng felt that:

- The second runway would worsen Crawley's issues and the town would become over developed, polluted and congested.
- The council should take a position over the second runway and state whether they are for or against a second runway.
- The vision of the Plan was unachievable if a second runway was developed.

Landowners with sites in the safeguarded area including the HCA, the Wilky Group and Windsor Developments Ltd requested more clarity over the role of safeguarded land should a second runway not come forward, particularly if safeguarding was lifted. Windsor Developments also felt that Policy EC1 should be revised to include a section referring to the need to review the Plan once a decision has been made.

## Sustainability Appraisal

Mr John Cooban;  
Highways Agency;  
Mayfield Market Towns – Tetlow King

A total of three representations were made to the Sustainability Appraisal, with comments received from a local resident, a technical stakeholder and a developer.

**Mr John Cooban**, a local resident, recognised that the Sustainability Appraisal made reference to green infrastructure, but suggested that a borough-wide tree strategy should be implemented.

**The Highways Agency (HA)** offered broad support for objectives 7 and 8, however, suggested some minor amendments, including a request that the proposed housing and employment sites within Appendix G are accompanied by evidence that the road infrastructure has been planned.

**Mayfield Market Town** proposed an alternative Sustainability Appraisal for their site as they believed the council's Sustainability Appraisal to the Local Plan was unsound as the council have not fully explored how unmet needs for employment and housing may be met elsewhere.

## Infrastructure Plan

Highways Agency

One representation was made to the Infrastructure Plan from the Highways Agency. They highlighted some inconsistencies between housing and employment figures in the Local Plan and those in the Infrastructure Plan.

## Local Plan Map

Aberdeen Investments – Savills;  
CEMEX UK Operations Ltd;  
Day Group Ltd;  
Mineral Products Association;  
DPDS Consulting;  
RSBP;  
Manor Royal BID Company;  
Aggregate Industries;

Wilky Group – Savills;  
Airport Industrial Property;  
West Sussex CC;  
T&L – Rapleys;  
Lynton Developments – Ancer Spa;  
Universities Superannuation Scheme-Deloitte

A total of fourteen representations were made to the Local Plan Map, with all seeking modifications to the map.

Five representations were received from **CEMEX Operations UK Ltd, Day Group, Aggregate Industries**, the **Mineral Products Association** and **West Sussex County Council** in relation to the Crawley Goods Yard at Tinsley Lane. All suggested that the Local Plan Map needed to be amended to designate Crawley Goods Yard as a safeguarded minerals site which reflects the West Sussex Minerals Local Plan.

Landowners with both employment and housing sites including the **Wilky Group, Aberdeen Investments, Mr C Heyman (DPDS Consulting), Lynton Developments (Ancer Spa)** and **T & L (Rapleys)** also suggested modifications to the map.

## Duty to Cooperate

Crest Strategic Projects – Savills;  
Persimmon Homes Thames Valley & Taylor Wimpey Ltd – Pegasus Group;  
House Builders Federation;  
Mayfield Market Town;  
Mid Sussex DC;  
West of Ifield Consortium;  
Marine Management Organisation;

Surrey CC;  
Mole Valley DC;  
Horsham DC;  
Sussex Police;  
Bupa – Alliance Planning;  
Reigate and Banstead BC;  
Bellway Homes and Barton Willmore;  
Arun DC

A total of sixteen representations were made to the Duty to Cooperate with the majority of representations from neighbouring authorities and the development industry.

Neighbouring authorities including **Mid Sussex District Council, Surrey County Council, Mole Valley District Council, Reigate and Banstead Borough Council** and **Horsham District Council** all considered that the Duty to Cooperate had been met with evidence of joint working shown in representations.

However, in contrast to this, representations from the development industry including **Mayfield Market Towns, the West of Ifield Consortium and Crest Strategic Projects** questioned whether the Duty to Cooperate had been met.

## Key Diagram

Crest Strategic Projects – Savills;  
Wilky Group – Savills;  
T&L – Rapleys

A total of three representations were made to the Key Diagram with comments from landowners and the development industry all suggesting modifications.

**Crest Strategic Projects** proposed amendments to outline 'potential areas of search' for urban extensions outside Crawley to include Land West of Kilnwood Vale.

**Rapleys**, on behalf of T&L LLP, raised objections to the designation of the site as a main employment area with no recognition of its committed retail consent and suggested changes should be made to the Key Diagram.

The Wilky Group promoting land at Gatwick Green recommended that the Key Diagram should include a strategic employment site East of Gatwick Airport.

## Crawley 2030: A Vision

Crest Strategic Projects – Savills;  
Highways Agency;  
Sussex Police

A total of three representations were made to the Crawley 2030 Vision with comments from technical stakeholders and the development industry.

The **Highways Agency** gave broad support for the vision, particularly the point which states "growth will be sustainable and supported by an Infrastructure Plan that complements development....A strong road network will be complemented by a good public transport system, giving people choice about how they travel". **Sussex Police** also supported the Vision with reference to the point about reducing crime and improving community safety.

**Crest Strategic Projects**, promoting Land East of Billingshurst and Land West of Kilnwood Vale, suggested that the vision required a new paragraph to promote joint working with neighbouring authorities to allow for sustainable urban extensions to Crawley.

## Chapter 2: Crawley 2030

### Spatial Context

Reigate and Banstead BC;	Network Rail;
Mr Peter Jordan;	IVA/IVCAAC;
Crest Strategic Projects – Savills;	Mr Colin Maughan;
Environment Agency;	Mr Graham Berry;
Highways Agency;	Mr Nicholas Price;
Gatwick Airport;	Bupa;
West Sussex CC;	Mr Arshad Khan

A total of fourteen representations were made to the Spatial Context with a mixture of comments received from local residents, technical stakeholders, neighbouring authorities and the development industry. However, many of the comments received to the Spatial Context were general comments on the Local Plan as a whole.

Technical stakeholders including the **Environment Agency** and **Network Rail** were supportive of the aims and principles set out in Local Plan. However, **IVA/IVCAAC**, as well as local resident **Mr Peter Jordan** felt that the vision was unattainable as the Plan does not address the issue of a possible second runway at Gatwick Airport.

The **Highways Agency** noted that the Spatial Context made reference to Crawley having excellent transport links including the M23 and M25, but concern was raised as this part of the strategic road network is under stress and congested at certain junctions.

## Chapter 3: Sustainable Development

### Policy SD1 – Presumption in Favour of Sustainable Development

Highways Agency;  
Gatwick Airport

A total of two representations were made to Policy SD1 with comments from technical stakeholders.

**Gatwick Airport** welcomed the positive theme of the Policy and similarly the **Highways Agency** provided broad support with some amendments suggested to Objective 2.

## Chapter 4: Character

General design principles attracted substantial interest, with support from **IVA/IVCAAC** for all Policies, notably CH6, CH8, CH9, CH11, CH12, CH13, CH14, CH15 and CH16. However, concern was raised by the development industry over national space standards, and representations were also received about the countryside to the north of the town and the implications of a second runway at Gatwick Airport.

### Policy CH1 – Neighbourhood Principle

Mrs Jennifer Grace Withall

One representation was made to Policy CH1, with comments from a local resident on the need for homes in Tilgate with ground floor access for the elderly.

### Policy CH2 – Principles of Good Urban Design

Aberdeen Investments – Savills;  
Gatwick Airport;  
Mr Peter Jordan

A total of three representations were made to Policy CH2.

**Gatwick Airport** welcomed this Policy, particularly parts (f) and (g) as it considered the Policy to promote sustainable development through the adoption of best planning practice. **Aberdeen Investments** raised concerns over the flexibility of the Policy and **Mr Peter Jordan** felt that the Plan failed to demonstrate a strategy which addresses Crawley's problems.

### Policy CH3 – Normal requirements of All New Development

Natural England;  
Aberdeen Investments – Savills;  
Mr Laurence Skinner;  
T&L – Rapleys;  
Highways Agency

A total of five representations were made to Policy CH3. Technical guidance was provided from **Natural England** and the **Highways Agency**, as well as objections to the soundness of the Policy from the development industry.

**Natural England** provided support for the Policy and its effectiveness in ensuring that developments such as Forge Wood which either include or adjoin sensitive areas will be protected and enhanced. However, the **Highways Agency** raised concern over point (c) of the Policy and sought clarity over this. **Rapleys**, on behalf of **T&L LLP**, also felt point (b) of the Policy was unnecessary.

### Policy CH4 – Comprehensive Development and Efficient Use of Land

Aberdeen Investments

One comment in support of Policy CH4 was received from **Aberdeen Investments**, but suggested that the Policy could be strengthened to encourage development proposals to optimise the potential of sites.

## **Policy CH5 – Standards for All New Dwellings (including conversions)**

Aberdeen Investments – Savills;  
Jennifer Grace Withall;  
Persimmon Homes Thames Valley & Taylor Wimpey Ltd – Pegasus Group

A total of three representations were made to Policy CH5 with the development industry questioning the soundness of the Policy.

**Aberdeen Investments** as well as **Pegasus Planning** on behalf of **Persimmon Homes Thames Valley & Taylor Wimpey LTD** raised the issue of the emerging national space standards and viability concerns. The robustness of the council's viability study ('Crawley Borough Council Community Infrastructure Levy and Affordable Housing Viability Assessment' Nationwide CIL Services, 2013) was raised, particularly in relation to the 'whole Plan' viability and whether the implications of the standards required by the Policies had been adequately reflected in the cost assumptions.

**Mrs Jennifer Grace Withall** highlighted that there is an increase in the number of elderly people looking for homes with ground floor access and that stair lifts and lifts should be considered in new dwellings.

## **Policy CH6 – Tree Planting and Replacement Standards**

Thames Water – Savills;  
Mr Clive Narrainen;  
IVA/IVCAAC;  
T&L – Rapleys

A total of four representations were made to Policy CH6 with a mixture of local residents, infrastructure providers and the development industry making representations.

The majority provided support for the principle of the Policy. However, **Thames Water** felt that the Policy needed to be improved in relation to tree planting near sewerage infrastructure. **Rapleys**, on behalf of **T&L LLP**, objected to the Policy and requested modifications as the Policy was too prescriptive.

## **Policy CH7 – Structural Landscaping**

Mr Laurence Skinner;  
Mr Richard Bucknall – Tony Fullwood Associates

A total of two representations were made to Policy CH7 with one from a local resident on the design of phone masts and another from a landowner.

**Tony Fullwood Associates**, on behalf of a landowner promoting land East of Street Hill, objected to the Policy on the grounds of soundness and alternative wording was provided.

## **Policy CH8 – Important Views**

Mole Valley DC;  
Network Rail;  
IVA/IVCAAC

A total of three representations were made to Policy CH8 with support received from **IVA/IVCAAC** and **Mole Valley District Council** who made reference to the safeguarding of long distance views

northwards from Tilgate Park into the countryside of Mole Valley and important landmarks. However, **Network Rail** requested that these be less of a consideration where railway infrastructure development is required within the view.

### **Policy CH9 – Development Outside the Built-Up Area**

The Ifield Society;  
Lynton Developments Ltd – Ancer Spa;  
High Weald AONB;  
Mr John Byng;

IVA/IVCAAC;  
Mr Derek Meakings;  
Highways Agency

A total of seven representations were made to Policy CH9, with a mixture of comments from landowners, local residents and technical stakeholders.

Representations from landowners including **Lynton Developments** reflected individual interests in specific sites located outside the built-up area boundary. Support for the Policy, particularly point (i) was given from **The Ifield Society**, as well as the **High Weald AONB**. The **Highways Agency** raised concern over point (vii) and suggested wording to reflect the protection of the Strategic Road Network from any impacts of rural development.

### **Policy CH10 – High Weald Area of Outstanding Natural Beauty**

High Weald AONB;  
IVA/IVCAAC

A total of two representations were made to Policy CH10 and both were in support of the protection of High Weald Area of Natural Beauty.

### **Policies CH11, CH12, CH13, CH14, CH15, CH16 and CH17**

These Policies were broadly supported, particularly from residents' groups including the **IVA/IVCAAC**, as well as technical guidance from **West Sussex County Council** in relation to the reference to the English Heritage recording levels.

Concern was raised by **Tony Fullwood Associates** to Policy CH17: Historic Parks and Gardens, reflecting their client's interest in land currently designated as such.

Policy CH13 raised objections from **Miss Sarah Fortnam** on Traveller sites.

## Chapter 5: Economic Growth

Policy EC1 received the most representations in this chapter, with comments from landowners, business groups, neighbouring authorities and local residents. Policy EC4 received a number of notable representations with four groups sharing the same view on the Crawley Goods yard at Tinsley Lane.

### Policy EC1 – Sustainable Economic Growth

Reigate and Banstead BC;	Mayfield Market Towns – Tetlow King;
Aberdeen Investments – Savills;	Highways Agency;
Mole Valley DC;	HCA – Savills;
Lynton Developments Ltd – Ancer Spa;	Horsham DC;
Windsor Developments – JMT Planning;	Mr Derek Meakings;
Manor Royal BID Company;	Network Rail;
Crest Strategic Projects – Savills;	Mr John Byng;
Crawley’s Local Economy Action Group;	Costco;
Wilky Group – Savills;	Gatwick Airport

A total of eighteen representations were made to Policy EC1 with comments from neighbouring authorities, landowners, local residents, business groups and technical stakeholders.

Those in support of the policy included neighbouring authorities, key businesses and key business representation groups such as Manor **Royal BID Company** (MRBC) and **Crawley’s Local Economy Action Group** (LEAG). Representations in support of the Policy appreciated the problems faced by CBC over the uncertainty of the future of Gatwick Airport and the need to safeguard land. Many highlighted the importance of protecting employment land within the main employment areas at Manor Royal and South and East of the Airport for uses which support and enhance the key functions of the area. This was considered particularly relevant when considering the implications on the Manor Royal Business District in light of the national permitted development changes.

In contrast to this, representations objecting to the Policy came from landowners within the safeguarded area including the **Wilky Group** with many expressing concern over the outcome of a second runway at Gatwick Airport and the need for further options and strategic employment sites to be identified.

**Reigate and Banstead Borough Council** highlighted the employment sites identified by their adopted Core Strategy will only meet the needs arising within their borough and will, therefore, not be available to address any unmet needs arising from within Crawley.

### Policy EC2 – Economic Growth in Main Employment Areas

Aberdeen Investments – Savills;	Gatwick Airport;
Mr Ross McNulty – GL Hearn;	Universities Superannuation Scheme – Deloitte
Crawley’s Local Economy Action Group;	
Airport Industrial Property;	

A total of six representations were received to Policy EC2 with comments from landowners, business groups, technical stakeholders and the development industry.

Representations from **Crawley’s LEAG** provided support for Policy EC2 and highlight the need to protect and build upon the main employment areas identified.



Those objecting including the **Universities Superannuation Scheme** asked for greater flexibility in the Policy for employment land for wider economic-generating uses, from the retail and business industry advocating particular companies and sites within areas not identified in Policy EC2. **Gatwick Airport** also recommended some changes and requested the Policy acknowledged the potential employment role of sites within the airport boundary.

### **Policy EC3 – Manor Royal**

Mr Laurence Skinner;  
Manor Royal BID Company;  
Travis Perkins;  
Mineral Products Association;

Crawley's Local Economy Action Group;  
Canadian Portland Estates and Jeff Thomas;  
T&L – Rapleys;  
HCA – Savills

A total of eight representations were made to Policy EC3, with comments from many raising similar issues to those highlighted in Policy EC2.

Those in support of the Policy emphasised the need to protect and enhance Manor Royal as a distinctive business location and a main employment area, primarily for B class uses. **Manor Royal BID Company** supported this and proposed that the council should consider the use of an Article 4 to protect Manor Royal from permitted development rights.

Objectors to EC2 supported the policy objective in principle. However those questioning the soundness of the policy noted that non B class uses should be acknowledged. **Rapleys** on behalf of **T&L LLP** felt that non B class uses, including retail, would complement and enhance the attractiveness of Manor Royal to support and secure existing and future businesses and workforce.

### **Policy EC4 – Employment Development and Residential Development**

Manor Royal BID Company;  
Crawley's Local Economy Action Group;  
CEMEX UK Operations Ltd;  
Day Group LTD;

Aggregate Industries;  
HCA – Savills;  
Mineral Products Association

A total of seven representations were received, with five in relation to the Crawley Goods Yard at Tinsley Lane and others from landowners and local business groups. All supported the principle objective of Policy EC4. However, some groups proposed amendments to the wording in order for the Policy to be made 'sound'.

Three companies operating at Crawley Goods Yard (a safeguarded minerals site) including **CEMEX UK Operations Ltd**, **Aggregate Industries** and **Day Group Ltd**, as well as the **Mineral Products Association**, suggested that the Policy needed to be strengthened so that the economic function of main employment areas would not be compromised by inappropriate development.

**Manor Royal BID Company** also supported this view and suggested that the Policy, particularly point 5.46 could be strengthened to ensure that additional buffer zones are not created or extended.

### **Policy EC5 – Town Centre Uses**

Reigate and Banstead BC;  
Thames Water – Savills;  
Mr Laurence Skinner;

Crawley's Local Economy Action Group;  
HCA – Savills;  
Horsham DC

A total of six representations were made to Policy EC5 with comments received from a mixture of groups.

The majority of representations provided support, including **Crawley's LEAG** and the **HCA** with both recognising Crawley as a key retail destination and a town of sub-regional significance.

However, concern was raised by **Reigate and Banstead Borough Council** over the absence of a specific figure and phasing for the amount of retail growth planned for Crawley town centre. **RBBC** suggested that a coordinated approach must be taken to ensure that development plans for Crawley town centre will not impact on plans for Redhill town centre. **Horsham District Council** also felt that growth in Crawley town centre should be complementary to Horsham town centre.

**Mr Laurence Skinner** a local resident proposed that a "Park and Ride" facility should be implemented, as well as free parking close to the Town Centre to encourage more people to shop in Crawley rather than other centres nearby.

### **Policy EC6 – Town Centre and Edge of Centre Development Sites**

Reigate and Banstead BC;  
Moat Housing;  
Crawley's Local Economy Action Group;  
Highways Agency

A total of four representations were made to Policy EC6 with comments from a developer, a local business group, a technical stakeholder and a neighbouring authority.

**Moat Housing** recognised the need for housing in the Town Centre and supported the delivery of residential schemes, particularly Telford Place. The **Highways Agency** also encouraged this approach as they believed mixed use developments in the Town Centre or on edge of centre sites are more sustainable.

### **Policy EC7 – Retail and Leisure Development outside the Primary Shopping Area**

Crawley's Local Economy Action Group;  
T&L – Rapleys

A total of two representations were received to Policy EC7.

This Policy was supported in principle by consultant **Rapleys**, acting on behalf of T&L Crawley LLP, however, some objections were raised and wording amendments suggested.

**Crawley's LEAG** was supportive of a "town centre first" policy where planning encourages retail and complementary uses into the town.

## Chapter 6: Housing

A substantial number of representations were received on Chapter 6: Housing, with the majority of comments from the development industry and landowners. Main concerns were raised over the objectively assessed housing need figure, the viability of 40% affordable housing, the proposed Gypsy and Traveller site at the Broadfield Kennels site, as well as landowners promoting sites both within and outside the borough.

### Policy H1 – Housing Provision

Aberdeen Investments – Savills;	Home Builders Federation;
Mole Valley DC;	West of Ifield Consortium;
Thames Water – Savills;	Gladman Developments;
Crest Strategic Projects – Savills;	IVA/IVCAAC;
Persimmon Homes Thames Valley & Taylor Wimpey Ltd. – Pegasus Group;	Mayfield Market Towns – Tetlow King;
DPDS Consulting;	Bellway Homes/Barton Willmore;
Waverley BC;	HCA – Savills;
Bupa – Alliance Planning;	Horsham DC;
Highways Agency;	Sussex Police;
Reigate and Banstead BC;	Gatwick Airport

A total of twenty representations were made to Policy H1 with a high proportion of comments from the development industry objecting to the Policy.

Representations from neighbouring authorities such as **Horsham District Council** recognised and appreciated the constraints Crawley Borough Council face with regards to housing land availability. However, concerns were raised from the development industry including the **Home Builders Federation** over the Local Plans objectively assessed housing need figure of 8,100 over the Plan period and the perceived lack of inclusion of the unknown needs arising from London.

### Policy H2 – Key Housing Sites

Aberdeen Investments – Savills;	West of Ifield Consortium;
Thames Water – Savills;	Mr. Charles Crane;
Persimmon Homes Thames Valley & Taylor Wimpey Ltd – Pegasus Group;	Mr Richard Bucknall – Tony Fullwood Associates;
Mr C Heyman – DPDS Consulting;	Mineral Products Association;
Sport England;	Tinsley Lane Residents Association;
West Sussex CC – Minerals Safeguarding;	Sogno Family – Savills;
West Sussex CC – Transport;	HCA – Savills;
Southern Water;	Day Group LTD;
CEMEX UK Operations Ltd.;	Aggregate Industries;
Network Rail;	Bupa – Alliance Planning;
Crest Strategic Projects;	Gatwick Airport

A total of twenty-one representations were received to Policy H2 with many from developers and landowners promoting sites through their representation including:-

- Mayfield Market Town (outside the borough in Mid Sussex and Horsham)
- West of Ifield (outside the borough, in Horsham)
- West of Kilnwood Vale (outside the borough, in Horsham)
- Land East of Billingshurst (outside the borough, in Horsham)
- Land East of Street Hill, Worth (identified in the SHLAA as 'Unsuitable')
- Oakhurst Grange, Southgate
- Steers Lane, Forge Wood (allocated in the Local Plan as a broad location)

- Heathy Farm, Forge Wood (allocated in the Local Plan as a broad location)
- Tinsley Lane, Three Bridges (allocated in the Local Plan as a Deliverable site)
- Kilnmead, Northgate (allocated in the Local Plan as a Deliverable Site)

In terms of Infrastructure, **Southern Water** provided detailed information in relation to the infrastructure capacity to meet the allocated housing sites, but raised some concerns regarding the lack of delivery dates. **Thames Water** also provided comments on waste water in relation to sites in Policy H2.

Representations were also made from **Sport England** and **Mr Charles Crane** in relation to development of the playing fields, particularly those at Bewbush.

Four representations from **CEMEX Operations UK Ltd**, **Aggregate Industries**, **Day Group Ltd** and the **Mineral Products Association** objected to the housing site at Tinsley Lane for 138 dwellings. Concerns arose over the proximity of the proposed housing site to the safeguarded minerals site which borders the site. **Tinsley Lane Residents' Association** also objected to this site and felt that the site should stay as a recreational space.

### **Policy H3 – Future Housing Mix**

Aberdeen Investments – Savills;  
Persimmon Homes Thames Valley & Taylor Wimpey Ltd – Pegasus Group

A total of two representations were made to Policy H3 with comments from landowners and the development industry.

**Aberdeen Investments** supported the Policy's reference to delivering an appropriate mix of housing types and sizes. However, they felt that the Policy needed to be more flexible to respond to changes in the market. This was also the view of **Persimmon Homes and Taylor Wimpey**.

### **Policy H4 – Affordable and Low Cost Housing**

Aberdeen Investments – Savills;  
Persimmon Homes Thames Valley & Taylor Wimpey Ltd. – Pegasus Group;  
Home Builders Federation;  
Bupa – Alliance Planning;  
HCA – Savills

A total of five representations were made to Policy H4 with comments from developers and those promoting sites.

Strong objections were raised from developers, including the **Home Builders Federation**, **Bupa** and **Persimmon Homes and Taylor Wimpey** over the viability of the rate of 40% affordable housing on all new developments, and the implications of the low cost requirement.

### **Policy H5 – Gypsy, Traveller and Travelling Showpeople Sites**

Natural England;	Miss Sarah Fortnam;
Reigate and Banstead BC;	West Sussex CC – Transport Access;
Mole Valley DC;	High Weald AONB;
Natalie Bingham;	Mr Kevin Berry;
Mr Alan Quirk;	Gatwick Airport;
Mr Richard A Flint;	Horsham DC

A total of eleven representations were received to Policy H5 with a mixture of comments received from local residents, technical stakeholders and neighbouring authorities.

Policy H5 received strong objections from **local residents** over the location of a reserve Gypsy and Traveller site at Broadfield Kennels. Concerns were raised in terms of highways access, nature conservation, the AONB and a perceived covenant on the land. **Gatwick Airport** also raised concerns regarding the noise criteria in the Policy.

Neighbouring authorities including **Reigate and Banstead Borough Council** and **Mole Valley District Council** made reference to the need to continue to work jointly in relation to this matter. **Horsham District Council** also supported the flexible approach taken to meeting the needs of the Gypsy, Traveller and Travelling Showpeople communities within Crawley.

The **High Weald AONB** unit welcome the reference to the AONB Management Plan and suggested that additional work may be needed but they are happy to assist with this.

## Chapter 7: Environment

### Policy ENV1 – Green Infrastructure

Environment Agency;  
Mr John Byng

A total of two representations were made to Policy ENV1 with both in support of the importance of green areas in Crawley.

### Policy ENV2 – Biodiversity

Louise Richardson;  
Environment Agency;  
Mr Richard Bucknall – Tony Fullwood Associates;  
Wilky Group – Savills;  
RSPB SE

A total of five representations were made to Policy ENV2 with a mixture of comments received from local residents, interest groups, technical stakeholders and landowners.

The **RSPB South East and Miss Louise Richardson** were in support of the Policy. However, they suggested that the Policy should recognise that all developments in urban areas could contribute to increasing biodiversity and that the Policy should be amended to reflect a more open approach. The **Environment Agency** also recommended some amendments to the wording of the Policy.

Landowners, including the **Wilky Group** who are promoting the Gatwick Green development, supported the Policy in principle. However, the group felt that Policy ENV2 would lead to an unjust and excessive constraint on major development required to meet growing socio-economic needs.

## Policy ENV3 – Local Green Space

The Ifield Society;  
Mr Peter Jordan;  
Jillian Katherine Bell;  
Mr Martin Hayward;  
Mrs Anne Scutt;

David Christensen;  
IVA/IVCAAC;  
Mr Brian Eastman;  
Mr Peter Temple-Smith;  
Mr William Geraint Thomas;

A total of 10 representations were made to Policy ENV3, with comments primarily from local residents or residents groups.

100% support was received in relation to the proposed designation of Ifield Brook Meadows and Rusper Road Playing Fields as a Local Green Space. Comments received highlighted the importance of Local Green Space, the area's suitability for this designation, and the need to preserve and enhance these assets for future generations.

## Policy ENV4 – Open Space, Sport and Recreation

Sport England;  
Mr Richard Bucknall – Tony Fullwood Associates;  
HCA – Savills

A total of three representations were made to Policy ENV4 with comments from landowners and technical stakeholders.

Support for the Policy was received from **Sport England** and the **HCA**, whilst **Tony Fullwood Associates**, on behalf of a landowner, raised concerns over point (d) and suggested that it should be deleted and the natural open space designation should be removed from Land East of Street Hill.

## Policy ENV6 – Sustainable Design and Construction

Persimmon Homes Thames Valley & Taylor Wimpey Ltd. – Pegasus Group;  
Environment Agency;  
Home Builders Federation;  
T&L – Rapleys

A total of four representations were made to Policy ENV6, with comments mainly arising from technical stakeholders and the development industry.

The **Environment Agency** provided support for the Policy and noted that Crawley had increased the standards to excellent under BREEAM and amended the original Policy.

In contrast to this, the **Home Builders Federation** and **Persimmon Homes & Taylor Wimpey Ltd** believed the Policy to be unsound. Comments were made in relation to the government's Housing Standards Review and the need for the Policy to be more consistent with the direction of national policy.

**Rapleys** (T&L LLP) also raised objections to the requirement that buildings have to adhere to BREEAM excellent and suggested that this was too high and didn't take into account flexibility and viability issues.

## Policy ENV7 – District Energy Networks

KTI Energy Limited;  
Persimmon Homes Thames Valley & Taylor Wimpey Ltd. – Pegasus Group;  
Home Builders Federation;  
T&L – Rapleys;  
Horsham DC

A total of five representations were made to Policy ENV7, with comments from a neighbouring authority, an energy company and the development industry.

**Horsham District Council** were supportive of this Policy and welcomed the positive approach taken towards tackling climate change. However those from the development industry including the **Home Builders Federation** and **Persimmon Homes & Taylor Wimpey** objected to this Policy as they believed it conflicted with national policy.

## Policy ENV8 – Development and Flood Risk

Thames Water – Savills;  
Environment Agency;  
West Sussex CC

A total of three representations were made to Policy ENV8, with comments from technical stakeholders and the County Council. All supported the Policy in principle. However, some amendments were suggested to strengthen the Policy.

**Thames Water** proposed that there should be a specific Policy on wastewater/sewage infrastructure, whilst the **Environment Agency** suggested modifications in relation to point (v.) on surface water run-off. **West Sussex County Council** also suggested amendments to paragraphs 7.63 and 7.65.

## Policy ENV9 – Tackling Water Stress

Mr Laurence Skinner; Persimmon Homes Thames Valley & Taylor Wimpey Ltd. – Pegasus Group; Environment Agency;	Horsham DC; Home Builders Federation; Arun DC
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A total of seven representations were made to Policy ENV9, with representations from the development industry, technical stakeholders, a local resident and a neighbouring authority.

Support was provided by the **Environment Agency**. However, objections were made by the development industry including the **Home Builders Federation** in relation to the government's proposals set out in the Housing Standards Review to abandon the Code for Sustainable Homes as a national standard.

## Policy ENV10 – Pollution and Management Contamination

Environment Agency

One representation was received from the Environment Agency in support of the Policy.

## Policy ENV11 – Development and Noise

West Sussex CC;  
CEMEX UK Operations Ltd;  
Mr John Byng;  
Aggregate Industries;

Gatwick Airport;  
HCA – Savills;  
Day Group LTD;  
Mineral Products Association

A total of eight representations were made to Policy ENV11 with comments from a wide range of different groups including local businesses, a resident and technical stakeholders.

Four representations were received in relation to the Crawley Goods Yard at Tinsley Lane including **CEMEX UK Operations, the Mineral Products Association, Aggregate Industries and Day Group Ltd** with concerns raised over the proximity of the goods yard to a housing site proposed in H2.

**Gatwick Airport** provided support for the Policy. However, some amendments were suggested including clarity over points (i) and (ii). **WSSC** also provided some guidance and suggested that the Policy should make reference to the Noise Action Plan from Defra.

## Chapter 8: Infrastructure

### Policy IN1 – Infrastructure Provision

Aberdeen Investments – Savills;  
Thames Water – Savills;  
The Theatres Trust;  
Network Rail;  
T&L – Rapleys;  
Mr Graham Berry;

NHS CCG;  
Highways Agency;  
Gatwick Airport;  
Horsham DC;  
Sussex Police

A total of eleven representations were made to Policy IN1, with comments received from a number of key infrastructure providers in Crawley.

Infrastructure providers including the **Highways Agency** and **Sussex Police** offered technical guidance and highlighted the relationship between infrastructure provision and CIL.

**Thames Water** proposed that there should be a Policy dealing with water and sewerage infrastructure and provided wording for this. **The Theatres Trust** supported this Policy and welcomed the inclusion of 'cultural facilities' in paragraph 8.7, but suggested that this term needed to be defined in the glossary.

### Policy IN3 – New Development and Requirements for Sustainable Transport

Network Rail;  
Highways Agency;  
Surrey CC;

Gatwick Airport;  
Horsham DC

A total of five representations were made to Policy IN3 with comments from technical stakeholders and neighbouring authorities. All representations provided support. However, some guidance was offered to strengthen the Policy further.



**Network Rail** suggested that the impact of new development on level crossings should be taken into account and if required new or improved level crossings should be implemented through either Section 106 or CIL.

**Gatwick Airport** gave support for the Policy objective of promoting more sustainable forms of transport, but **Gatwick Airport** suggested that the Plan could go further by encouraging more sustainable modes of transport by providing attractive alternatives to the private car where possible.

### **Policy IN4 – Car and Cycle Standards**

Home Builders Federation

One representation was made to Policy IN4 with the **Home Builders Federation** (HBF) objecting on the grounds of soundness. The HBF suggested that the Policy was ineffective as the detail relating to this Policy is published in a separate SPD which is not compliant with the NPPF.

### **Policy IN5 – The Location and Provision of New Infrastructure**

Home Builders Federation;  
Network Rail;  
Highways Agency

A total of three representations were made to Policy IN5 with comments from technical stakeholders and the development industry.

Support was received from the **Highways Agency**. However, the **Home Builders Federation** and **Network Rail** highlighted that the Policy should make reference to CIL.

### **Policy IN6 – Improving Rail Stations**

Home Builders Federation;  
Network Rail;  
Gatwick Airport

A total of three representations were raised to Policy IN6 with comments received from the development industry and technical stakeholders.

**Network Rail** provided support for the Policy, but suggested some amendments in relation to specific rail stations. **Gatwick Airport** also provided broad support for the objectives of the Policy, particularly point (a). However the **Home Builders Federation** sought the inclusion of CIL in this Policy.

### **Policy IN7 – Crossovers**

Environment Agency

One representation was made to Policy IN7 from the **Environment Agency** and suggested some amended wording which included that only semi permeable and permeable paving will be supported.

## Chapter 9: Gatwick Airport

### Policy GAT1 – Development of the Airport with a Single Runway

Mrs Jane Wilson;  
Mr Derek Meakings;  
Gatwick Airport;  
HCA – Savills;

Horsham DC;  
Mole Valley DC;  
IVA/IVCAAC;  
Mr Peter Jordan

A total of eight representations were made to Policy GAT1, with comments from a variety of groups including local residents and groups, technical stakeholders and neighbouring authorities.

Local residents and local resident groups including **Mrs Jane Wilson, Mr Derek Meakings, Mr Peter Jordan** and **IVA/IVCAAC** raised concerns over the development of a second runway at Gatwick Airport.

Whilst **Gatwick Airport** and **Horsham District Council** supported the policy and welcomed the reference to the upcoming Airports Commission consultation and that both Horsham and Crawley's Development Plans may need to be reviewed if Gatwick is the chosen Airport for a second runway.

### Policy GAT2 – Safeguarded Land

Mr Heyman – DPDS Consulting;  
Gatwick Airport;

HCA – Savills;  
Wilky Group – Savills

A total of four representations were made to Policy GAT2, with comments received from a variety of groups including local residents, technical stakeholders and landowners.

**Gatwick Airport** recommended that Policy GAT2 should be amended to incorporate a specific aerodrome safeguarding policy which they believed to be more appropriate and robust than the text in paragraph 9.20.

Landowners, including the **Wilky Group** promoting the Gatwick Green development, found the Policy to be too rigid and failed to make provision for a strategic employment site within the safeguarded land that is compatible with ancillary and surface transport facilities required to serve a second runway at Gatwick Airport.

### Policy GAT3 – Gatwick Airport Related Parking

Highways Agency;  
Gatwick Airport

A total of two representations were made to Policy GAT3 with support received from both technical stakeholders.

### Policy GAT4 – Employment Uses at Gatwick

Gatwick Airport;  
Airport Industrial Property

A total of two representations were made to Policy GAT4. **Gatwick Airport** supported this Policy as it now reflects the position promoted by Gatwick Airport in allowing non-airport related commercial development within the airport boundary. **Airport Industrial Property** also provided support for this Policy.

## Noise Annex

Gatwick Airport

One representation was received to the Noise Annex. **Gatwick Airport** raised concerns and suggested that the Noise Annex needed to be reconsidered; specifically the thresholds set within columns 3 and 4 of the last three rows of Table 1 and paragraphs 4.1.7 to 4.1.10.

## Background Studies and Evidence Base

### Transport Strategy

Highways Agency  
West Sussex CC

Two representations were received to the Transport evidence. The **Highways Agency** raised concerns over the transport modelling and suggested that there was incomplete evidence. **WSSC** supported the work commissioned by the council to produce the Crawley Local Plan Transport Strategy.

## Glossary

The Theatres Trust

One representation was made to the Glossary from the Theatres Trust with the request that the term 'cultural facilities' is included in the description of "Infrastructure" in the glossary (in line with the supporting text to Policy IN1).

## 4. Examination Stage

- 4.1. In line with the Crawley Borough Council SCI and the Town and Country Planning (Local Planning ) (England) Regulations 2012 (Regulation 22), the representations received in relation to the Submission Consultation will be subjected to consideration as part of the independent examination into the Local Plan.

### **INSPECT**

#### **Stage 3 – independent examination**

Consider feedback received at Stage 2 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 attend and/or speak at examination. Provided the plan is found 'sound' at the examination it can be considered at Full Council for formal adoption.

A Supplementary Planning Document does not require independent examination, and would be considered directly by Cabinet for adoption.

- 4.2. This Statement of Consultation fulfils the requirements of Regulation 22(c) and the SCI.
- 4.3. The council submitted the Local Plan and all representations made during the submission consultation stage to the Secretary of State in November 2014. Mr Martin Pike BA MA MRTPI was appointed to carry out an examination into the soundness of the Local Plan. Examination Hearing Sessions for the Local Plan were held by the appointed Inspector during the period 17 March to 27 March 2015, with an additional session held on 18 May 2015.

## 5. Modifications Stage

- 5.1 Following receipt of the Inspector's Preliminary Findings (26 May 2015 and 23 June 2015) the council proposed a number of modifications to the Local Plan. A six-week formal public consultation period was held to provide interested parties the opportunity to comment on the council's proposed modifications to the submission Crawley Borough Local Plan (September 2014).
- 5.2 This Modifications Consultation stage ran from 1 July to 5pm 12 August 2015, inviting representations to be made on the proposed modifications to the Local Plan.
- 5.3 The consultation focused solely on the new modifications proposed and was not open to comments on the Plan as a whole.
- 5.4 All advertising and communication materials used during this stage of consultation are set out in Appendix 7 of this Statement of Consultation.
- 5.5 Copies of all representations received during this stage of consultation are included within Appendix 8 of this Statement of Consultation.

### What are the Consultation's aims?

- 5.6 The consultation aims were:
- To conduct the consultation in line with the Statement of Community Involvement;
  - To provide people the opportunity to comment on the modifications proposed to the Local Plan as part of the Examination process.

### Who we consulted?

- 5.7 All those registered on Crawley Borough Council's Local Plan consultee database were consulted via post and email with details of how to submit comments and where to view the relevant consultation documents. This included local residents, businesses, technical stakeholders, interest groups, developers and landowners in the borough. In total approximately 1,595 people were directly consulted, with a full list set out in Appendix 8.
- 5.8 Those who made representations at the submission consultation stage (Regulation 19), along with those who participated in the examination hearing sessions were added to the Local Plan database to ensure they were informed of the proposed modifications and the Programme Officer also raised awareness of the consultation.
- 5.8 A further 502 contacts subscribed to the Crawley Borough Council email alert system were also notified of the consultation.
- 5.9 A public notice was published in the Crawley Observer on 1 July. This was also placed on the council's Public Notices page of the website and featured on the council's homepage.
- 5.10 Crawley's Conservation Area Committees, including Worth Conservation Area Advisory Committee were informed of the modifications made to the Local Plan and the consultation period, with a special meeting arranged by the Chair of the Worth Conservation Area Advisory Committee to discuss Main Modification MM28 Policy H2 and the allocation of Land East of Balcombe Road/Street Hill as a housing, biodiversity and heritage site for 15 dwellings.

### How did we conduct the consultation?

- 5.11 The consultation provided the opportunity for comments to be made on the modifications proposed to the Local Plan by the council as part of the Examination process. The consultations documents included a modified version of the submission Local Plan, a schedule of the individual main and minor modifications proposed, the modified Local Plan Map and a number of updated evidence base documents. They are as follows:
- The Local Plan Modifications Consultation Draft (June 2015)
  - Schedule of Proposed Modifications to the Local Plan (June 2015)
  - The Local Plan Map Modifications Consultation Draft (June 2015)
  - The Built Up Area Boundary Review (2015)
  - Strategic Housing Land Availability Assessment (June 2015)
  - Housing Trajectory (June 2015)
- 5.12 All of the information and documents relating to the consultation were made publicly available on the council's website through the following page: [www.crawley.gov.uk/crawley2030mods](http://www.crawley.gov.uk/crawley2030mods) as well as through the council's home page and latest news section.
- 5.13 Representations to the modifications could be submitted online by using the council's e-form, by email or by completing a paper form and sending it to the Town Hall.
- 5.14 Similar to the submission consultation stage, when making a representation people had to consider whether the proposed modifications made to the Local Plan complied with legal requirements, the duty to cooperate and was sound. In order for people to understand these terms, a guidance note was prepared. Paper copies of the form and guidance note, including hard copies of all the documents were available at the Town Hall, Crawley Library and Broadfield Library.
- 5.15 To inform people of the start and close of the consultation, including details of how to respond, E-mails and letters were sent to statutory and general consultation bodies, local residents and businesses along with all those who made representations at the submission consultation stage and attended the examination hearing sessions.

### Worth Conservation Area Meeting

- 5.16 On 10 August 2015, the Chair of the Worth Conservation Area Advisory Committee held a public meeting in Worth to discuss the Inspectors recommendation for Land East of Balcombe Road/Street Hill to be allocated in the Local Plan for up to 15 dwellings. Approximately 80 people attended the meeting, with Ward Councillors in attendance.
- 5.17 Overall, there was general opposition to the proposed housing allocation. However, if Land East of Balcombe Road/Street Hill was to remain as a housing allocation in the Local Plan, those that attended the meeting raised a number of key issues:
- Parking Provision;
  - Maintenance of the SNCI;
  - Timely Infrastructure;
  - Flooding;
  - The design of the development and that it should be in keeping with the surrounding area.
- 5.18 Those in attendance at the meeting were informed of the close of consultation and how representations could be submitted.

### Representations Received

- 5.19 Approximately 90 representations were made to individual Local Plan modifications/policies in

the Local Plan from 60 representors. The majority of representations came from local residents, particularly those living in Worth, and technical stakeholders including:

- Sussex Wildlife Trust;
- Highways England;
- Thames Water;
- Southern Water;
- Environment Agency;
- Historic England;
- Sussex Gardens Trust;
- WSCC;
- Sport England.

- 5.20 30 local residents provided comments, with most in relation to the allocation of Land East of Balcombe Road/Street Hill, with others commenting on the housing sites at Tinsley Lane, Breezehurst Drive and Henty Close.
- 5.21 Four local groups provided comments on behalf of its members including Ifield Village Conservation Area Advisory Committee, Worth Conservation Area Advisory Committee, Tinsley Lane Residents Association and Tilgate Community Forum.
- 5.22 The housing chapter received the most representations, with particular focus on MM27 (Policy H1) and MM28 (Policy H2).
- 5.23 The majority of comments to MM27 (Policy H1) came from neighbouring authorities and those promoting land outside the borough with support provided for the inclusion of the unmet housing need figure and reference to cross boundary working in the Policy.
- 5.24 Representations on MM28 (Policy H2) focused on:-
- The allocation of Land East of Balcombe Road/Street Hill, with a large proportion of comments from the local residents of Worth and technical stakeholders including the Environment Agency, Sussex Wildlife Trust, Sussex Gardens Trust and Historic England, along with a representation made on behalf of the landowner.
  - Tinsley Lane, with comments from a local resident, Tinsley Lane Residents Association, the landowner/developer, WSCC, Sport England and the Goods Yard.
  - Breezehurst Drive, with comments from a local resident and Sport England.
  - Henty Close, with comments from a local resident.
- 5.25 Suggested amendments to the wording of Policy H2 to make the Policy more robust came from Sussex Wildlife Trust, Sport England, Historic England and the Environment Agency.
- 5.26 Other policies and documents that received more than one representation included:
- The Built Up Area Boundary Review 2015;
  - Policy IN1: Infrastructure Provision;
  - Policy ENV2: Biodiversity;
  - Policy ENV4: Open Space, Sport and Recreation;
  - Policy H5: Gypsy, Traveller and Travelling Show People Sites;
  - Policy ENV11: Development and Noise;
  - Policy EC1: Economic Growth;
  - Policy GAT2: Safeguarded Land.
- 5.27 The full representations received can be found in Appendix 8 of this document.

## 6. Monitoring

- 6.1 The final stage in the council's SCI refers to the monitoring stage. This is vital to ensure that the adopted documents achieve their aims.

### MONITOR

We will regularly monitor all of our adopted plans to make sure they are achieving their aims, and may if necessary review them to reflect any changes. We will also monitor the effects of plan policies as required by European Directives.

- 6.2 The Local Plan includes monitoring indicators aimed at ensuring the objectives of the Plan are implemented and ensure the policies remain relevant and effective. This will be published in the form of the Authority's Monitoring Report, at least annually (but not limited to) as the data is available.
- 6.3 The Local Plan includes an expectation for a review to be considered at the point of a government decision on further expansion of UK airport runway capacity.