

# Consultation Statement

Draft January 2020



This document has been prepared in accordance with:

- ⇒ The Town and Country Planning (Local Planning) (England) Regulations 2012
- ⇒ Crawley Borough Council Statement of Community Involvement: A guide to participating in the planning system (November 2019)

## CONTENTS

|   | <b>Page</b>              |
|---|--------------------------|
| <b>1. Introduction</b>  | <b>2</b>                 |
| <b>2. Early Consultation Stage (Regulation 18)</b>                                    | <b>3</b>                 |
| Early Engagement Consultation's Aims  | 3                        |
| Who we consulted  | 3                        |
| How the consultation was conducted:   | 4                        |
| a. Consultation Materials & Media   | 5                        |
| b. Events   | 6                        |
| Summary of Representations Received:  | 7                        |
| a. Local Plan   | 7                        |
| o General   | 7                        |
| o Sustainable Development   | 8                        |
| o Character & Design  | 8                        |
| o Landscaping & Landscape Character   | 9                        |
| o Heritage  | 10                       |
| o Open Space, Sport & Recreation  | 10                       |
| o Infrastructure Provision  | 10                       |
| o Economic Growth   | 11                       |
| o Gatwick Airport   | 11                       |
| o Crawley Town Centre   | 12                       |
| o Housing   | 12                       |
| o Green Infrastructure & Biodiversity   | 13                       |
| o Sustainable Design & Construction   | 14                       |
| o Environmental Protection  | 14                       |
| o Sustainable Transport   | 14                       |
| b. Sustainability Appraisal/Strategic Environmental Assessment                        | 15                       |
| c. Infrastructure Plan  | 15                       |
| d. Habitat Regulations Assessment   | 15                       |
| <b>3. Publication Consultation Stage (Regulation 19)</b>                              | <b>16</b>                |
| <b>4. Next Steps</b>  | <b>18</b>                |
| <b>Appendix 1: Early Engagement Consultation Materials</b>                            | <b>Separate Document</b> |
| <b>Appendix 2: Early Engagement Consultation Representations and Council Response</b> | <b>Separate Document</b> |

## 1. Introduction

- 1.1 This document has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012<sup>1</sup> and the council's adopted Statement of Community Involvement (SCI)<sup>2</sup>.
- 1.2 The council has begun its review on the current Local Plan and will be carrying out a further consultation exercise to see what people think of its draft future policies. The Local Plan is a document that outlines how the town should be planned and developed between 2020 and 2035. This consultation is a key part of Crawley Borough Council's Local Plan Review process. The consultation will be undertaken with people living and working in Crawley, and those with particular interests, to better understand how they think the town should develop by 2035.
- 1.3 This stage of consultation forms the statutory 'Publication' consultation for the Local Plan Review. It follows an earlier formal stage of public consultation, which was undertaken between July and September 2019. These two main stages of public consultation were established by the council's adopted Local Development Scheme<sup>3</sup>.

| Consultation Period(s)  | Date                             |
|---|----------------------------------|
| <b>Early Engagement Stage (Regulation 18)</b>                 |                                  |
| Issues, Options and Preferred Approach<br>Public Consultation | 15 July 2019 – 16 September 2019 |
| <b>Publication Stage (Regulation 19)</b>                      |                                  |
| Submission Consultation                                       | January 2020 – March 2020        |

- 1.4 The Publication Consultation is the 'final' stage of consultation undertaken on what the council considers to be its "Sound" Local Plan for the purposes of submission to the Secretary of State for independent examination.

---

<sup>1</sup> Town and Country Planning (Local Planning) (England) Regulations 2012:  
<http://www.legislation.gov.uk/ukxi/2012/767/contents/made>

<sup>2</sup> Crawley Borough Council Statement of Community Involvement: A guide to participating in the planning system (November 2019) CBC: [Statement of Community Involvement](#)

<sup>3</sup> Local Development Scheme 2019 – 2021 (November 2019) CBC: [Local Development Scheme 2019 - 2021](#)

## 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 | <i>Stage one – early engagement</i>  |
|         | <p>Gather evidence, including independent studies and advice, to input and support production of the document.</p> <p>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.</p> <p>Consider if issues identified can be addressed by the plan and make available feedback to show how responses have been considered.</p> <p>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.</p> |

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

### Early Engagement Consultation’s Aims

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

### Who we consulted

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

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Crawley Borough Council Officers | External Partners & Key Stakeholders   |
|----------------------------------|--|
| Environmental Health             | West Sussex County Council: including Strategic Planning, Local Education Authority and Public Health;<br>Neighbouring Authorities as part of Northern West Sussex Housing Market Area, Gatwick Diamond authorities, Gatwick Officers Group, and West Sussex and Greater Brighton<br>Crawley Health and Wellbeing Board<br>Crawley CCG<br>Gatwick Airport<br>Southern Water<br>Sussex Biodiversity Record Centre<br>Major Landowners |
| Economic Regeneration            |  |
| Development Management           |  |
| Sustainability                   |  |
| Community Development            |  |
| Amenity Services                 |  |
| Property                         |  |
| Waste Services                   |  |
| Drainage                         |  |
| Housing                          |  |
| Crawley Homes                    |  |
| Deputy Chief Executive           |  |

- 2.5 The formal public consultation, carried out between July and September 2019, was open for the involvement and engagement for all who have an interest in Crawley borough. This included those who live, work and visit the town, as well as investors, businesses, landowners, developers, neighbouring authorities and interest groups (national, south east England, Sussex and local).
- 2.6 Those self-registered on Crawley Borough Council’s Planning News Alert service were notified by email, on three occasions:
- at the start of the consultation;
  - at the mid-point of consultation; and
  - a final reminder with one week to go before the end of the consultation.
- 2.7 Those notified through the Planning News emails included statutory consultees, developers, stakeholders, interest groups, and individual residents. In addition, notifications were set out in relation to the Local Plan consultation to those people signed up to Community and Neighbourhood News Alerts.
- 2.8 Furthermore, individuals, organisations and stakeholders were also targeted directly through a range of methods, including social media and exhibitions and events.

How the consultation was conducted

- 2.9 The early engagement consultation was undertaken over an extended two month consultation<sup>4</sup>, in order to take account of the summer holiday period. Workshops and meetings took place after the summer holidays in September.
- 2.10 The council published the following Consultation Draft Documents for scrutiny and comment:
- Crawley 2035: Draft Consultation Crawley Local Plan 2020 – 2035 (July 2019)
  - Sustainability Appraisal/Strategic Environment Assessment Scoping and Draft Report
  - Habitat Regulations Assessment Screening Report
  - Draft Consultation Statement
  - Draft Infrastructure Plan.

<sup>4</sup> 15 July until 16 September 2019

- 2.11 These were available online on the council's dedicated website: **[crawley.gov.uk/crawley2035](http://crawley.gov.uk/crawley2035)**. This could also be accessed via a QR code available on all consultation documentation. Paper copies could be viewed at the Town Hall and Crawley Library, during normal office hours.
- 2.12 A high level Questionnaire was made available online and in paper format.
- 2.13 A public display was located in Crawley Town Hall reception area over the entire consultation period, during the normal office opening hours. This provided details of the public consultation and how people were able to engage and respond.
- 2.14 A manned exhibition was also held:
- at the Town Hall on two full working days at the start and mid-consultation period;
  - at Crawley Library on two after-work evenings (up until the Library closing time of 7pm);
  - at K2 Crawley between 3pm and 8pm in order to capture visitors and residents using the leisure centre, including those people attending classes, as well as local residents; and
  - at County Mall on two Saturdays, at the start and later on in the consultation, to capture working residents and visitors to the town's sub-regional offers.
- 2.15 The council engaged in existing forums and meetings where this was possible, this included the Young People's Council; Local Economy Action Group; the Town Access Group and the Manor Royal BID Management Group.
- 2.16 Representatives from relevant local and particular interest groups were invited to attend a Community Forum workshop. Each neighbourhood forum and Conservation Area Committee was notified of the consultation and invited to the Community Forum.
- 2.17 A Developer and Business Forum was set up, with over 100 different contacts, and a workshop was held.

### **Consultation Materials & Media**

- 2.18 The following consultation materials were used to maximise the engagement opportunities and raising awareness of the consultation:
- Formal press notice - Crawley Observer: Statement of Representation Procedure and Notification of Public Consultation;
  - Local press releases;
  - Posters on neighbourhood noticeboards;
  - Council Magazine 'Crawley Live';
  - Leaflets;
  - Local Plan Policy Questions;
  - Questionnaire;
  - Investor Newsletter Item;
  - Online via Crawley Borough Council website, Facebook and Twitter.
- 2.19 Wherever possible, images, maps and infographics were used to simplify complex and detailed messages and increase the accessibility of the Local Plan process.
- 2.20 Social media was capitalised, including through the council's main Facebook page, which offered opportunities to link into existing local forums' own pages and reaching Crawley residents and individuals in an alternative form. The use of Facebook provided opportunities to highlight specific issues and matters

throughout the consultation period, and gather feedback through comments made and discussions generated on these issues.

- 2.21 Due to the desire to secure maximum feedback and engagement, the data requirements of the consultation was more flexible than the Regulation 19 stage of consultation will have to be. Names and address were not requested from responses, in order to limit concerns regarding privacy and data collection.
- 2.22 If representors wished to keep updated and informed of the Plan as it progresses, they were invited to self-register for the Planning News Alert service. This will be used throughout the consultation, and following the close of consultation as the Plan progresses, to provide updates on the preparation of the Plan.

### **Events**

- 2.23 Manned exhibitions were successful in providing those who were informed about the Local Plan to discuss more detailed aspects of the 2035 Plan with council officers and also to raise awareness with other residents and visitors who were otherwise unaware of the Local Plan or the public consultation. Feedback was gathered instantly through noting discussions with individuals, and also through distribution of leaflets and questionnaires in the anticipation that the discussions held at the exhibition would generate a desire to more formally engage.

### **County Mall**

- 2.24 Two exhibitions were held in County Mall on Saturdays during the day:
1. Saturday 27 July (10am – 4pm)
  2. Saturday 17 August (10am – 4pm)
- 2.25 In total, 269 number of people attended and engaged. On 27 July: 94 people in total spoke to officers, and a further 27 people observed and took leaflets; on 17 August: 113 people spoke to officers and a further 35 people observed and took leaflets. This included local residents and representatives from residents and ‘friends of’ groups who received the Planning News alert.

### **Town Hall**

- 2.26 Two exhibitions were held in the Town Hall during the normal working day:
1. Monday 29 July (10:30am – 4pm)
  2. Monday 19 August (10:30am – 4pm)
- 2.27 In total, 24 individual people attended and engaged. On 29 July: four people in total spoke to officers, and a further two people observed and took leaflets; on 19 August: 18 people spoke to officers. This included representatives from businesses already engaged in the Local Plan Review process and local residents who came specifically to discuss issues in more detail. Matters which were discussed included Gatwick Airport, and proposals from Homes England to create urban extensions to Crawley on land to the west of Ifield.

### **Crawley Library**

- 2.28 Two exhibitions were held in Crawley Library:
1. Tuesday 6 August (5pm – 6:50pm)
  2. Monday 9 September (5pm – 6:50pm)
- 2.29 In total, 65 number of people attended and engaged. On 6 August: 25 people in total spoke to officers, and a further nine people observed and took leaflets; on 9 September: 30 people spoke to officers and one additional person observed and took leaflets. This included local residents and representatives from residents and ‘friends of’ groups who received the Planning News alert and



updates from the Community Development team reminders using social media. Matters which were discussed included Crawley's growth and population, Gatwick Airport, green spaces and infrastructure capacity.

### **K2 Crawley**

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

1. Monday 5 August (3pm – 8pm).

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

### **Developer Forum**

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

### **Community Forum**

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

### Summary of Representations Received

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

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

#### **a. Local Plan**

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

| Main Issues   | How this was taken into account? |
|---|----------------------------------|
| <p><b>General:</b><br/><i>Comments were received from 27 individuals, businesses and organisations on general matters, the consultation process itself, viability, and the overarching issues relating to the Local Plan, including Duty to Cooperate, the Local Plan Map, other Development Plan Documents, and the Local Plan's Vision and the Spatial Context.</i></p> |                                  |

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues   | How this was taken into account?  |
|---|---|
| <p><i>This included comments from Mid Sussex District Council, Horsham District Council, West Sussex County Council, Environment Agency, Sussex Wildlife Trust, agents on behalf of landowners, Gatwick Airport Limited, Sussex Ornithological Society, Department for Education, Manor Royal BID, Home Builders Federation, Historic England, Sport England and local residents.</i></p>   |   |
| <ul style="list-style-type: none"> <li>• Need for the policies to be simpler and avoid duplication.</li> <li>• Support for the Vision.</li> <li>• Importance of, and support for, continual and effective Duty to Cooperate.</li> <li>• Importance of viability testing of the Plan as a whole Plan, including ensuring developer engagement, taking a cautious approach to land value and benchmark values as well as when using BCIS data, fees and finance, profit and policy requirements including concern of biodiversity net gain.</li> <li>• Highlighting the importance of linking with the County's Minerals and Waste Planning.</li> <li>• The need to safeguard land for the provision of new schools and school expansions and securing developer contributions for education, as well as Free School projects.</li> <li>• Concern with the use of the "At Crawley" study area.</li> </ul> | <p>The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies.</p> <p>Amendments have been made to remove unnecessary duplication and clarify purpose of the character and design policies.</p> <p>The preparation and inclusion of a Planning Obligations Annex makes clear up front the implications for developers of some of the policies in the Plan. The Whole Plan and CIL Viability Assessment is currently in the process of being commissioned.</p> <p>The purpose of the "At Crawley" plan has been clarified and the key has been amended for the avoidance of doubt of its intentions.</p> |
| <p><b>Sustainable Development:</b><br/><i>Comments were received from 22 individuals and organisations on the Sustainable Development chapter of the draft Local Plan Review. These included 12 responses to the set survey questions. In addition to these, detailed comments were received from 10 organisations and businesses, including from Sport England, Historic England, The Woodland Trust, CPRE Sussex, Environment Agency, The Ifield Society, the Town Access Group and two agents on behalf of developer/landowners.</i></p> <p><i>Representations in general supported the two policies in this chapter. However, changes were suggested in terms of highlighting specific features, constraints and opportunities, and also challenging the policy weight placed on developers.</i></p>  |   |
| <ul style="list-style-type: none"> <li>• General support for the sustainable development and well-being policies.</li> <li>• Strengths of Crawley include facilities, transport links (including Gatwick), balance demographic, vibrancy, good parks and leisure facilities.</li> <li>• Weaknesses of Crawley include maintenance, air and noise pollution, cycle network.</li> <li>• Concerns raised regarding health services, and particularly capacity of GP provision.</li> <li>• Strong support for the bus network – need to extend spatially and time (to support night-time economy).</li> <li>• Promotion of including water quality and water resources into Sustainable Development policy.</li> <li>• Promotion of including wildlife, heritage and sports in to Healthy Lifestyles and Wellbeing policy.</li> </ul>   | <p>Amendments have been made to detailed policies to address matters and suggestions raised.</p>  |
| <p><b>Character &amp; Design:</b><br/><i>Comments were received from 35 individuals and organisations/businesses on the Character &amp; Design Chapter. These included comments from seven individuals at the events and 12 responses to the set survey questions. In addition, detailed comments were received from 16 organisations and businesses, including from the Town Access Group, Sport England, Historic England, Home Builders Federation, Sussex Ornithological Society, Gatwick Airport Limited, West Sussex County Council, The Woodland</i></p>   |   |

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues  | How this was taken into account?   |
|--|--|
| <p><i>Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Mid Sussex District Council and four agents on behalf of developer/landowners.</i></p> <p><i>Specific comments were received on every policy in this Chapter (Policies CD1, CD2, CD3, CD4(a), CD4(b), CD5, CD6, CD7, CD8, CD9, CD10 and CD11) as well as general observations on the character and design of Crawley.</i></p>   |  |
| <ul style="list-style-type: none"> <li>• Density and Design/Character policies generated debate, with both positions of support and objection being received from both residents and developers.</li> <li>• Support for strategic urban design and integrated landscaping policies.</li> <li>• Concern of confusion, contradiction and repetition of some of the policies in this chapter – clarity being requested from agents acting on behalf of landowners/developers.</li> <li>• Concern raised in relation to the implementation of the transport and access approach. Support received for encouragement of active design and travel.</li> <li>• Detailed questions were raised in relation to the application of the Density Policy, along with some support received and some objections.</li> <li>• Concern of over-prescription in relation to character assessments and design tools from agents acting on behalf of landowners/developers.</li> <li>• Objection from Home Builders Federation to continuation of Building Regulations Part M4(2) – accessible and adaptable for all new dwellings, and support for accessible and inclusive design from the Town Access Group.</li> <li>• Detailed comments provided on Crossover, Advertisement and Aerodrome Safeguarding policies.</li> <li>• Suggestions include inclusion of wording relating to open space, landscaping and ecological networks.</li> </ul> | <p>The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies.</p> <p>Amendments have been made to remove unnecessary duplication and clarify purpose of the character and design policies.</p> <p>Amendments have been made to the density levels.</p> <p>Disagree in relation to the objections to the “accessible and adaptable” dwellings – this is an adopted Policy and the evidence in the Strategic Housing Market Assessment supports its continuation. It will be included in the viability assessment.</p> <p>Amendments have been made to detailed policies to address matters and suggestions raised.</p> |
| <p><b>Landscaping &amp; Landscape Character:</b><br/><i>Comments were received from 31 individuals and organisations/businesses on the Landscape &amp; Landscape Character Chapter. These included comments from six individuals at the events and 10 responses to the set survey questions. In addition, detailed comments were received from 16 organisations and businesses, including from Thames Water, High Weald AONB Unit, West Sussex County Council, Historic England, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group, Mid Sussex District Council and five agents on behalf of developer/landowners.</i></p> <p><i>Specific comments were received on paragraph 5.18 and on every policy in this Chapter (Policies LC1, LC2, LC3, LC4, LC5 and LC6) as well as general observations on the landscape character of Crawley.</i></p>   |  |
| <ul style="list-style-type: none"> <li>• Concerns raised around designations impacting on future development potential and landowner concerns.</li> <li>• Strong support for the borough’s existing soft landscaping.</li> <li>• Support for the tree retention and replacement policy, as well as concern regarding the method of its calculation and the need to consider it as part of viability assessment.</li> <li>• Concern that the land outside the built-up area boundary should not be considered unsuitable for development – issues of safeguarding and gap between Crawley and Gatwick Airport raised by agents</li> </ul>   | <p>The first two chapters of the draft Local Plan have been restructured in order to clarify the scope and individual purpose of the policies.</p> <p>Amendments have been made to detailed policies to address matters and suggestions raised.</p> <p>Amendments to the High Weald AONB policy have been made and greater reference in the supporting text to the Management Plan context. A new plan has</p>   |

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues  | How this was taken into account?  |
|--|---|
| <p>working on behalf of landowners of sites within this area.</p> <ul style="list-style-type: none"> <li>Comments made on the High Weald Area of Outstanding Natural Beauty policy and links to the Management Plan priorities.</li> </ul>   | <p>been introduced to the document, to show the small area of AONB within Crawley at a closer scale, to highlight the key planning policy designations within this area.</p>  |
| <p><b>Heritage:</b><br/> <i>Comments were received from 21 individuals and organisations/businesses on the Heritage Chapter. These included comments from two individuals at the events, one resident via email and 10 responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from Sussex Gardens Trust, Council for British Archaeology South-East, Surrey County Council, Historic England, The Woodland Trust, Sussex Wildlife Trust, the Ifield Society and one agent on behalf of developer/landowner.</i></p> <p><i>Specific comments were received on paragraphs 6.1-6.4, 6.7/6.8 and Policies HA1, HA2, HA3, HA4 and HA6 as well as general observations on Crawley's heritage.</i></p>  |   |
| <ul style="list-style-type: none"> <li>Recommendations to make more explicit reference to archaeological assets.</li> <li>Support for the heritage policies with recommendations on detailed wording in Heritage Assets, Conservation Areas, Listed Buildings and Historic Parks and Gardens policies.</li> <li>Links between trees and ancient woodland as heritage, biodiversity and landscape assets.</li> </ul>  | <p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p> <p>A new archaeology policy has been introduced.</p> <p>Links have been made in relation to trees and ancient woodland and their heritage value, and cross-reference made to the biodiversity policy.</p> |
| <p><b>Open Space, Sport &amp; Recreation:</b><br/> <i>Comments were received from 30 individuals and organisations/businesses on the Open Space, Sport &amp; Recreation Chapter. These included comments from 12 individuals at the events, one resident via email and 10 responses to the set survey questions. In addition, detailed comments were received from seven organisations and businesses, including from The British Horse Society, Sport England, West Sussex County Council, The Woodland Trust, Sussex Wildlife Trust, the Ifield Society and one agent on behalf of developer/landowner.</i></p> <p><i>Specific comments were received on paragraphs 7.15-7.17 and on every policy in this Chapter (Policies OS1, OS2 and OS3) as well as general observations on Open Space, Sport and Recreation provision and protection.</i></p>  |   |
| <ul style="list-style-type: none"> <li>Strong support for the borough's parks and open spaces.</li> <li>Requests to strengthen policy wording in relation to public rights of way and multi-use routes.</li> <li>Comments received regarding need to maintain, protect and enhance use of accessible semi-natural greenspace provision.</li> <li>Requests for indoor sports facilities including skating rinks and bowling alleys and disabled sports facilities.</li> </ul>   | <p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p> <p>Amendments made to the public rights of way policy in accordance with the technical and specialist advice.</p>   |
| <p><b>Infrastructure Provision:</b><br/> <i>Comments were received from 36 individuals and organisations/businesses on the Infrastructure Provision Chapter. These included comments from 10 individuals at the events and 11 responses to the set survey questions. In addition, detailed comments were received from 16 organisations and businesses, including from Thames Water, National Grid, West Sussex County Council, Southern Water, Surrey County Council, Department for Education, Gatwick Airport Limited, The Woodland Trust, Environment Agency, The Ifield Society, Town Access Group, NHS Property Services and one agent on behalf of developer/landowner.</i></p> <p><i>Specific comments were received on page 83, paragraph 8.3, 8.9, 8.15-8.22 and on every policy in this Chapter (IN1, IN2 and IN3) as well as general observations on provision of Infrastructure within Crawley.</i></p> |   |

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues   | How this was taken into account?   |
|---|--|
| <ul style="list-style-type: none"> <li>Concerns raised around designations impacting on future development potential and landowner concerns.</li> <li>Health and education issues raised by local residents and the infrastructure providers/agencies.</li> <li>Support for infrastructure policies, regarding maintenance and where they are located outside of Crawley (but serve Crawley).</li> <li>Information provided regarding specific infrastructure services and networks (including water, waste water, energy, education, highways, fire and rescue, and health).</li> <li>Request for financial contributions to be sought from development to support education and health needs.</li> <li>Detailed wording suggested for the communications infrastructure policy.</li> </ul>  | <p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p> <p>Cross-reference now made to the new Planning Obligations Annex to accompany the Plan, which collates all known and anticipated developer contributions associated with the Local Plan policies.</p> <p>Inclusion of reference to securing contributions towards education and health has been included in the policy.</p> <p>Amendments made to the communications policy in accordance with the technical and specialist advice.</p> |
| <p><b>Economic Growth:</b><br/>Comments were received from 33 individuals and organisations/businesses on the Economic Growth Chapter. These included comments from three individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 21 organisations and businesses, including from Mole Valley District Council, Sport England, Manor Royal BID, West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, Reigate and Banstead Borough Council, Horsham District Council, the Ifield Society, and 10 agents on behalf of developer/landowners and one business.</p> <p>Specific comments were received on Policies EC1, EC2, EC3, EC4, EC5, EC6, EC7, EC8, EC9, EC10 and EC12 as well as general observations on Economic Growth of Crawley.</p>  |  |
| <ul style="list-style-type: none"> <li>Comments in relation to the constrained land supply and developer promotion of sites and safeguarding and car parking from agents on behalf of landowners of sites within this area.</li> <li>Concern regarding interpretation of the office policy – with a few businesses and agents believing it to be prioritising office development over other business development such as industrial.</li> <li>Support and concerns raised in relation to the Visitor and Night-Time economy policies – including in relation to hotels in Manor Royal and at the Airport.</li> </ul>  | <p>This chapter has been amended to reflect the updated evidence from the Economic Growth Assessment.</p> <p>Amendments have been made to reflect the intention to undertake an Area Action Plan on the “area of search” land, which will include consideration of meeting the economic needs arising from the borough.</p> <p>The Skills Policy has been amended and greater detail regarding the planning obligations expectations from developers has been included in the Planning Obligations Annex.</p>                                      |
| <p><b>Gatwick Airport:</b><br/>Comments were received from 39 individuals and organisations/businesses on the Gatwick Airport Chapter. These included comments from nine individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 20 organisations and businesses, including from Mole Valley, Manor Royal BID, West Sussex County Council, Thames Water, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group, Horsham District Council and six agents on behalf of developer/landowners and one business.</p> <p>Specific comments were received on paragraphs 10.1-10.9, 10.11-10.15, 10.17-10.25, 10.27-10.30, and on every policy in this Chapter (Policies GAT1, GAT2, GAT3 and GAT4) as well as general observations on Gatwick Airport.</p> |  |
| <ul style="list-style-type: none"> <li>Support for retaining safeguarding and support for removing safeguarding from the public. Gatwick Airport</li> </ul>   | <p>The draft Local Plan proposes to remove safeguarding and replace a wider area “the Area of Search” with the commitment to</p>   |

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues  | How this was taken into account?  |
|--|---|
| <p>Limited support retaining safeguarding and landowner submissions requiring the removal of safeguarding for other economic development.</p> <ul style="list-style-type: none"> <li>• Position from Gatwick Airport Limited supporting amending the Airport boundary and, objections from landowners and others suggesting it to be retain as current (should safeguarding be retained).</li> <li>• Support for all on-airport parking, and support for allowing off-airport parking from the public. Representations from off-airport parking provider supporting off-airport parking. Support for retaining on-airport parking approach from Gatwick Airport Limited.</li> </ul>  | <p>produce an Area Action Plan. This Development Plan Document will be commenced at the point of the Local Plan's adoption. It will consider the appropriate land uses within the area and set detailed policies for the proper planning and development of the area. This will include the need for runway expansion and airport growth (subject to robust evidence of need); economic development, housing development and the Crawley Western Link Road alignment. It will also include consideration of the land needed to maintain the gap between Crawley and the Airport.</p> <p>The draft Local Plan maintains the on-airport car parking approach.</p> <p>The draft Local Plan maintains the Airport boundary to that relating to the council's own records.</p> |
| <p><b>Crawley Town Centre:</b><br/><i>Comments were received from 26 individuals and organisations/businesses on the Crawley Town Centre Chapter. These included comments from eight individuals at the events and 12 responses to the set survey questions. In addition, detailed comments were received from five organisations and businesses, including from Sussex Wildlife Trust, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner.</i></p> <p><i>Specific comments were received on Policies TC2, TC3 and TC5 as well as general observations on Crawley Town Centre.</i></p>   |   |
| <ul style="list-style-type: none"> <li>• Limited responses overall in relation to the Town Centre.</li> <li>• Strong support for Crawley Town Centre facilities and accessibility.</li> <li>• Desire for greater offer and particular shops.</li> <li>• Support the need for neighbourhood facilities policy, but concern the policy should not be used for residential developments to provide the facilities required.</li> <li>• Highlighting the need for town centre impact testing to include other town centres beyond Crawley town centre from RBBC (i.e. Redhill).</li> </ul>   | <p>Amendments have been made to the Town Centre chapter reflect the updated emerging evidence position.</p> <p>Detailed amendments have been made to the Key Opportunities Sites policy for the purposes of clarity.</p> <p>Confirmation has been included to the need for impact testing for other centres beyond Crawley Town Centre.</p>   |
| <p><b>Housing:</b><br/><i>Comments were received from 79 individuals and organisations/businesses on the Housing Chapter. These included comments from 32 individuals at the events, six residents via email/letter, 11 responses to the set survey questions and a response from the local MP. In addition, detailed comments were received from 29 organisations and businesses, including from Thames Water, Mole Valley District Council, Southern Water, Home Builders Federation, West Sussex County Council, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Rusper Parish Council, Sussex Wildlife Trust, CPRE Sussex, National Custom and Self-Build Association, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group, Mid Sussex District Council, Horsham District Council and nine agents on behalf of developer/landowners, one business and one agent on behalf of the Crawley Goods Yard.</i></p> |   |

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues  | How this was taken into account?  |
|--|---|
| <p><i>Specific comments were received on paragraphs 12.17 and 12.34 and Policies H1, H2, H3b, H3c, H3d, H3e, H3g, H4, H5, H6, H7 and H8 as well as general observations on Housing and the Housing Trajectory.</i></p>   |   |
| <ul style="list-style-type: none"> <li>• Comments made by other authorities regarding their inabilities in meeting Crawley's unmet needs supporting maximising the amount to which Crawley meets its own needs within its boundaries and pressing the Local Plan to ensure no stone is unturned (including support for the increased densities policy).</li> <li>• Some concerns from neighbouring authorities raised over the remit and wording of the draft urban extensions policy.</li> <li>• Concern against 'over development' of Crawley, and support for urban extensions instead of building within Crawley where this is to meet Crawley's affordable housing needs, from some local residents.</li> <li>• Support for 'going up' instead of 'out'. Concern regarding particular promoted urban extension to the west of Crawley by Homes England, from some local residents.</li> <li>• Opposition to building housing on open spaces.</li> <li>• Concern the housing mix being provided is restricted to small units, not meeting needs of families, and perception of too many flats and not enough houses (even small houses with gardens).</li> <li>• New site at St. Catherine's Hospice promoted for housing or care home.</li> <li>• Support from landowners/developers of existing sites for the continued inclusion of their site in the Plan. Suggestions from some landowners that the anticipated yield should be reconsidered and increased.</li> <li>• Comments received on detailed policies for Build to Rent and Custom and Self-Build Housing.</li> <li>• Concern regarding the continued allocation for the reserve Gypsy and Traveller site at Broadfield Kennels from two local residents and the local MP, as well as an objection to the existing housing allocation at Breezehurst Drive Playing Fields from one local resident.</li> </ul> | <p>Amendments have been made to the housing chapter reflect the updated evidence position.</p> <p>This includes changing the affordable housing tenure split to 75/25 rental/intermediate (from the existing 70/30 split).</p> <p>Amendments to the Key Housing Sites policy to reflect the factual build-out of sites and allocate three new sites (one new town centre key opportunity site; one housing and open space site; and one housing for older people site; and the deallocation of one site due to conflicts with the noise policy).</p> <p>Some changes have been made to better clarify the purpose of the urban extensions policy.</p> |
| <p><b>Green Infrastructure &amp; Biodiversity:</b><br/><i>Comments were received from 21 individuals and organisations/businesses on the Green Infrastructure &amp; Biodiversity Chapter. These included comments from four individuals at events and eight responses to the set survey questions. In addition, detailed comments were received from nine organisations and businesses, including from West Sussex County Council, the British Horse Society, Sussex Ornithological Society, The Woodland Trust, Sussex Wildlife Trust, Environment Agency, the Ifield Society and one agent on behalf of developer/landowner.</i></p> <p><i>Specific comments were received on paragraph 13.17 and on every policy in this Chapter (Policies GI1, GI2, GI3 and GI4) as well as general observations on Green Infrastructure and Biodiversity.</i></p>   |   |
| <ul style="list-style-type: none"> <li>• Concerns raised around designations impacting on future development potential and landowner concerns.</li> <li>• Support for the Green Infrastructure and Biodiversity policies.</li> <li>• Suggested detailed wording for the Green Infrastructure policy and the Biodiversity policies.</li> </ul>  | <p>Detailed amendments made to the chapter and policies to address comments and suggestions received.</p>   |

Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues   | How this was taken into account?  |
|---|---|
| <ul style="list-style-type: none"> <li>• Support for Biodiversity Net Gain – recommendations to strengthen the requirement, and concern regarding ensuring this is considered properly as part of the viability assessment.</li> <li>• Some suggested additional sites for consideration against the Local Green Space criteria, including: Tilgate Park, Worth Park, Grattons Park, Milton Mount, The Hawth, West Green Park and Ifield Millpond (currently the designation only applies to Ifield Brook Meadows and Playing Fields).</li> <li>• Concern from the landowner that the Local Green Space designation goes further than national policy.</li> </ul>   |   |
| <p><b>Sustainable Design &amp; Construction:</b><br/> Comments were received from 18 individuals and organisations/businesses on the Sustainable Design &amp; Construction Chapter. These included comments from two individuals at events, one resident via email and eight responses to the set survey questions. In addition, detailed comments were received from seven organisations and businesses, including from Southern Water, Home Builders Federation, Manor Royal BID, CPRE Sussex, Environment Agency and two agents on behalf of developer/landowners.</p> <p>Specific comments were received on every policy in this Chapter (Policies SDC1, SDC2 and SDC3) as well as general observations on sustainable design and construction.</p> |   |
| <ul style="list-style-type: none"> <li>• Support for the need to encourage sustainable energy provision.</li> <li>• Support for the tightening of water usage requirements.</li> <li>• Objections to requiring higher than national requirements.</li> </ul>  | Detailed amendments made to the chapter and policies to address comments and technical suggestions received.  |
| <p><b>Environmental Protection:</b><br/> Comments were received from 19 individuals and organisations/businesses on the Environmental Protection Chapter. These included comments from one individual at events and eight responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, CPRE Sussex, Environment Agency, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner.</p> <p>Specific comments were received on paragraph 15.18 and Policies EP1, EP2, EP3 and EP4 as well as general observations on Environmental Protection.</p>                     |   |
| <ul style="list-style-type: none"> <li>• Support for the flooding policies.</li> <li>• Concerns regarding air quality – particularly in relation to air and road transport, as well as from Pease Pottage compost facility.</li> <li>• Concern regarding noise pollution – particularly in relation to air and road transport, including from landowners affected and from GAL, who particularly drew attention to two of the housing allocations in the Plan (Steers Lane and Heathy Farm, both Forge Wood Residual Sites).</li> </ul>   | Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current national and local environmental health advice. |
| <p><b>Sustainable Transport:</b><br/> Comments were received from 48 individuals and organisations/businesses on the Sustainable Transport Chapter. These included comments from 20 individuals at events and 10 responses to the set survey questions. In addition, detailed comments were received from 18 organisations and businesses, including from Metrobus, Network Rail, Surrey County Council, Home Builders Federation, Manor Royal BID, West Sussex County Council, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust,</p>   |   |



Crawley Borough Council draft Regulation 19 Consultation Statement  
for consideration alongside the draft Submission Local Plan

| Main Issues   | How this was taken into account?  |
|---|---|
| <p><i>Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group and five agents on behalf of developer/landowners.</i></p> <p><i>Specific comments were received on paragraphs 16.1, 16.14 and on every policy in this Chapter (Policies ST1, ST2, ST3 and ST4).</i></p>  |   |
| <ul style="list-style-type: none"> <li>• Support for sustainable transport – strong support for the bus network and Fastway and improvements strongly supported.</li> <li>• Need to improve the cycle network and pedestrian access in the town.</li> <li>• Concern about existing road and junction capacity.</li> <li>• Support and objections to the principle of a Crawley Western Relief Road (tied to whether there was support or objection to potential urban extensions to the west of Crawley), and some detailed concerns regarding the alignment from landowners affected and Gatwick Airport Limited.</li> </ul> | <p>Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current highways advice and local and corporate sustainability approach.</p> <p>Parking Standards have been updated to incorporate the most up-to-date West Sussex evidence and these have been developed into a new Parking Standards Annex for the Local Plan.</p> <p>Reference in the Plan to the “Relief” road has been amended to the “Link” road, as this is felt better reflects the purpose of the road.</p> <p>The plan of “area of search for the Crawley Western Link Road” has been amended to show the correct area to the A23 north of County Oak.</p> |

**b. Sustainability Appraisal/Strategic Environmental Assessment**

2.37 Comments were received from five individual organisations and businesses on the SEA/SA. These were from the Sussex Ornithological Society, Sussex Wildlife Trust, Environment Agency and two agents on behalf of developer/landowners.

**c. Infrastructure Plan**

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

**d. Habitat Regulations Assessment**

2.39 Comments were received from one organisation on the Habitat Regulations Assessment, the Sussex Ornithological Society, who confirmed they believed an Appropriate Assessment was not necessary for Crawley Borough.

### 3. Publication Consultation Stage (Regulation 19)

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

- 3.1 Following the close of the previous consultation (Early Engagement), all responses received have been collated. These have fed into the preparation of the final draft Plan for its consideration by the council.
- 3.2 This document has been updated summarising the comments were received, the council's responses to these matters, and where they have been taken into account and/or led to changes in the final draft Plan (see Section 2.b above and Appendix 2).
- 3.3 A formal decision has to be made at Full Council to agree the draft Plan for publication and submission to the Secretary of State for its independent examination, before it can be adopted as the borough's Local Plan for planning decision making. The Plan the council submits to the Secretary of State for examination should form the Local Plan the council considers to be legally compliant and 'sound'<sup>5</sup>. This approval was secured at the Full Council meeting held on 16 December 2019.
- 3.4 For the Publication Stage of the Local Plan Review, the council will publish the following Consultation Final Draft Documents for scrutiny and comment:
- Crawley 2035: Draft Submission Crawley Local Plan 2020 – 2035 (December 2019)
  - Sustainability Appraisal/Strategic Environment Assessment Draft Report
  - Habitat Regulations Assessment Draft Report
  - Draft Consultation Statement
  - Draft Infrastructure Plan.
- Along with any new or updated evidence documents.
- 3.5 These will be available online on the council's dedicated website:  
**[crawley.gov.uk/crawley2035](http://crawley.gov.uk/crawley2035)**.
- 3.6 Paper copies can also be viewed at the Town Hall and Crawley Library:  
**Crawley Town Hall    Monday – Friday: 9am-5pm**  
**The Boulevard**  
**Crawley, RH10 1UZ**  
  
**Crawley Library        Monday – Friday: 9am-7pm; Saturday: 9am-5pm**  
**Southgate Avenue**  
**Crawley, RH10 6HG**

<sup>5</sup> i.e. Positively Prepared; Justified; Effective; and Consistent with National Policy (paragraph 35, National Planning Policy Framework, February 2019, MHCLG)

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

1. Legally Compliant
2. Sound

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

## 4. Next Steps

- 4.1 Following the close of this formal stage of public consultation, all feedback received will be considered and the messages from the consultation will be collated and summarised.
- 4.2 Responses to the issues raised will be provided and the outcomes of the consultation will be submitted alongside the draft Local Plan to the Secretary of State. These will inform the appointed Planning Inspector and will be considered as the Plan is taken forward through its independent examination.
- 4.3 As part of this process, due regard must be given to the outcomes of both the Early Engagement and Publication consultations.

| Stage                                 | Date                             |
|---------------------------------------|----------------------------------|
| Early Engagement consultation         | 15 July 2019 – 16 September 2019 |
| Full Council                          | 16 December 2019                 |
| Publication (Submission) consultation | 20 January – 2 March 2020        |
| Submission                            | March 2020                       |
| Examination in Public                 | July - September 2020            |
| Adoption                              | December 2020                    |