

# Consultation Statement

## September 2023



Crawley Borough Council Officer Responses  
to Crawley Borough Local Plan Review  
Representations Summaries

Formal Public Consultations Carried Out:  
2019 - 2023



# Crawley Borough Council Officer Responses to Formal Public Consultation Representations 2019 – 2023

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## 1. Early Engagement Consultation (Regulation 18): July – September 2019

Early Engagement Consultation (Regulation 18): July – September 2019	
Main Issues	How this was taken into account?
<p><b>General:</b></p> <p><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> <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></p> <p><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> </ul>	<p>Amendments have been made to detailed policies to address matters and suggestions raised.</p>

**Early Engagement Consultation (Regulation 18): July – September 2019**

Main Issues	How this was taken into account?
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<ul style="list-style-type: none"> <li>Promotion of including wildlife, heritage and sports into Healthy Lifestyles and Wellbeing policy.</li> </ul>	
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**Character & Design:**  
*Comments were received from 36 individuals and organisations/businesses on the Character & Design Chapter. These included comments from seven individuals at the events and 12 responses to the set survey questions. In addition, detailed comments were received from 17 organisations and businesses, including from the Town Access Group, Sport England, Historic England, Home Builders Federation, Sussex Ornithological Society, Gatwick Airport Limited, West Sussex County Council, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Mid Sussex District Council, four agents on behalf of developer/landowners and Natural England (received late due to technical issue).*  
*Specific comments were received on every policy in this Chapter (Policies CD1, CD2, CD3, CD4(a), CD4(b), CD5, CD6, CD7, CD8, CD9, CD10 and CD11) as well as general observations on the character and design of Crawley.*

<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>
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**Landscaping & Landscape Character:**  
*Comments were received from 32 individuals and organisations/businesses on the Landscape & Landscape Character Chapter. These included comments from six individuals at the events and 10 responses to the set survey questions. In addition, detailed comments were received from 17 organisations and businesses, including from Thames Water, High Weald AONB Unit, West Sussex County Council, Historic England, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group, Mid Sussex District Council, five agents on behalf of developer/landowners and Natural England (received late due to technical issue).*  
*Specific comments were received on paragraph 5.18 and on every policy in this Chapter (Policies LC1, LC2, LC3, LC4, LC5 and LC6) as well as general observations on the landscape character of Crawley.*

<ul style="list-style-type: none"> <li>Concerns raised around designations impacting on future development potential and landowner concerns.</li> </ul>	<p>The first two chapters of the draft Local Plan have been restructured in order to</p>
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## Early Engagement Consultation (Regulation 18): July – September 2019

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <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 working on behalf of landowners of sites within this area.</li> <li>• Comments made on the High Weald Area of Outstanding Natural Beauty policy and links to the Management Plan priorities.</li> </ul>	<p>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 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></p> <p><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></p> <p><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>

## Early Engagement Consultation (Regulation 18): July – September 2019

### Main Issues

### How this was taken into account?

#### Infrastructure Provision:

*Comments were received from 36 individuals and organisations/businesses on the Infrastructure Provision Chapter. These included comments from 10 individuals at the events and 11 responses to the set survey questions. In addition, detailed comments were received from 16 organisations and businesses, including from Thames Water, National Grid, West Sussex County Council, Southern Water, Surrey County Council, Department for Education, Gatwick Airport Limited, The Woodland Trust, Environment Agency, The Ifield Society, Town Access Group, NHS Property Services and one agent on behalf of developer/landowner.*

*Specific comments were received on page 83, paragraph 8.3, 8.9, 8.15-8.22 and on every policy in this Chapter (IN1, IN2 and IN3) as well as general observations on provision of Infrastructure within Crawley.*

- Concerns raised around designations impacting on future development potential and landowner concerns.
- Health and education issues raised by local residents and the infrastructure providers/agencies.
- Support for infrastructure policies, regarding maintenance and where they are located outside of Crawley (but serve Crawley).
- Information provided regarding specific infrastructure services and networks (including water, waste water, energy, education, highways, fire and rescue, and health).
- Request for financial contributions to be sought from development to support education and health needs.
- Detailed wording suggested for the communications infrastructure policy.

Detailed amendments made to the chapter and policies to address comments and suggestions received.

Cross-reference now made to the new Planning Obligations Annex to accompany the Plan, which collates all known and anticipated developer contributions associated with the Local Plan policies.

Inclusion of reference to securing contributions towards education and health has been included in the policy.

Amendments made to the communications policy in accordance with the technical and specialist advice.

#### Economic Growth:

*Comments were received from 33 individuals and organisations/businesses on the Economic Growth Chapter. These included comments from three individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 21 organisations and businesses, including from Mole Valley District Council, Sport England, Manor Royal BID, West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, Reigate and Banstead Borough Council, Horsham District Council, the Ifield Society, and 10 agents on behalf of developer/landowners and one business.*

*Specific comments were received on Policies EC1, EC2, EC3, EC4, EC5, EC6, EC7, EC8, EC9, EC10 and EC12 as well as general observations on Economic Growth of Crawley.*

- Comments in relation to the constrained land supply and developer promotion of sites and safeguarding and car parking from agents on behalf of landowners of sites within this area.
- Concern regarding interpretation of the office policy – with a few businesses and agents believing it to be prioritising office development over other business development such as industrial.
- Support and concerns raised in relation to the Visitor and Night-Time economy policies – including in relation to hotels in Manor Royal and at the Airport.

This chapter has been amended to reflect the updated evidence from the Economic Growth Assessment.

Amendments have been made to reflect the intention to undertake an Area Action Plan on the “area of search” land, which will include consideration of meeting the economic needs arising from the borough.

The Skills Policy has been amended and greater detail regarding the planning obligations expectations from developers has been included in the Planning Obligations Annex.

## Early Engagement Consultation (Regulation 18): July – September 2019

### Main Issues

### How this was taken into account?

#### Gatwick Airport:

*Comments were received from 39 individuals and organisations/businesses on the Gatwick Airport Chapter. These included comments from nine individuals at the events and nine responses to the set survey questions. In addition, detailed comments were received from 20 organisations and businesses, including from Mole Valley, Manor Royal BID, West Sussex County Council, Thames Water, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group, Horsham District Council and six agents on behalf of developer/landowners and one business.*

*Specific comments were received on paragraphs 10.1-10.9, 10.11-10.15, 10.17-10.25, 10.27-10.30, and on every policy in this Chapter (Policies GAT1, GAT2, GAT3 and GAT4) as well as general observations on Gatwick Airport.*

- Support for retaining safeguarding and support for removing safeguarding from the public. Gatwick Airport Limited support retaining safeguarding and landowner submissions requiring the removal of safeguarding for other economic development.
- Position from Gatwick Airport Limited supporting amending the Airport boundary and, objections from landowners and others suggesting it to be retain as current (should safeguarding be retained).
- Support for all on-airport parking, and support for allowing off-airport parking from the public. Representations from off-airport parking provider supporting off-airport parking. Support for retaining on-airport parking approach from Gatwick Airport Limited.

The draft Local Plan proposes to remove safeguarding and replace a wider area “the Area of Search” with the commitment to produce an Area Action Plan. This Development Plan Document will be commenced at the point of the Local Plan’s adoption. It will consider the appropriate land uses within the area and set detailed policies for the proper planning and development of the area. This will include the need for runway expansion and airport growth (subject to robust evidence of need); economic development, housing development and the Crawley Western Link Road alignment. It will also include consideration of the land needed to maintain the gap between Crawley and the Airport.

The draft Local Plan maintains the on-airport car parking approach.

The draft Local Plan maintains the Airport boundary to that relating to the council’s own records.

#### Crawley Town Centre:

*Comments were received from 26 individuals and organisations/businesses on the Crawley Town Centre Chapter. These included comments from eight individuals at the events and 12 responses to the set survey questions. In addition, detailed comments were received from five organisations and businesses, including from Sussex Wildlife Trust, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner.*

*Specific comments were received on Policies TC2, TC3 and TC5 as well as general observations on Crawley Town Centre.*

- Limited responses overall in relation to the Town Centre.
- Strong support for Crawley Town Centre facilities and accessibility.
- Desire for greater offer and particular shops.
- Support the need for neighbourhood facilities policy, but concern the policy should not be used for residential developments to provide the facilities required.

Amendments have been made to the Town Centre chapter reflect the updated emerging evidence position.

Detailed amendments have been made to the Key Opportunities Sites policy for the purposes of clarity.

Confirmation has been included to the need for impact testing for other centres beyond Crawley Town Centre.

## Early Engagement Consultation (Regulation 18): July – September 2019

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <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><b>Housing:</b>  <i>Comments were received from 80 individuals and organisations/businesses on the Housing Chapter. These included comments from 32 individuals at the events, six residents via email/letter, 11 responses to the set survey questions and a response from the local MP. In addition, detailed comments were received from 30 organisations and businesses, including from Thames Water, Mole Valley District Council, Southern Water, Home Builders Federation, West Sussex County Council, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Rusper Parish Council, Sussex Wildlife Trust, CPRE Sussex, National Custom and Self-Build Association, Environment Agency, Reigate and Banstead Borough Council, the Ifield Society, Town Access Group, Mid Sussex District Council, Horsham District Council and nine agents on behalf of developer/landowners, one business, one agent on behalf of the Crawley Goods Yard and Natural England (received late due to technical issue).</i></p> <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>

## Early Engagement Consultation (Regulation 18): July – September 2019

### Main Issues

### How this was taken into account?

#### Green Infrastructure & Biodiversity:

*Comments were received from 22 individuals and organisations/businesses on the Green Infrastructure & Biodiversity Chapter. These included comments from four individuals at events and eight responses to the set survey questions. In addition, detailed comments were received from 10 organisations and businesses, including from West Sussex County Council, the British Horse Society, Sussex Ornithological Society, The Woodland Trust, Sussex Wildlife Trust, Environment Agency, the Ifield Society, one agent on behalf of developer/landowner and Natural England (received late due to technical issue).*

*Specific comments were received on paragraph 13.17 and on every policy in this Chapter (Policies GI1, GI2, GI3 and GI4) as well as general observations on Green Infrastructure and Biodiversity.*

- Concerns raised around designations impacting on future development potential and landowner concerns.
- Support for the Green Infrastructure and Biodiversity policies.
- Suggested detailed wording for the Green Infrastructure policy and the Biodiversity policies.
- Support for Biodiversity Net Gain – recommendations to strengthen the requirement, and concern regarding ensuring this is considered properly as part of the viability assessment.
- Some suggested additional sites for consideration against the Local Green Space criteria, including: Tilgate Park, Worth Park, Grattons Park, Milton Mount, The Hawth, West Green Park and Ifield Millpond (currently the designation only applies to Ifield Brook Meadows and Playing Fields).
- Concern from the landowner that the Local Green Space designation goes further than national policy.

Detailed amendments made to the chapter and policies to address comments and suggestions received.

#### Sustainable Design & Construction:

*Comments were received from 19 individuals and organisations/businesses on the Sustainable Design & Construction Chapter. These included comments from two individuals at events, one resident via email and eight responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from Southern Water, Home Builders Federation, Manor Royal BID, CPRE Sussex, Environment Agency, two agents on behalf of developer/landowners and Natural England (received late due to technical issue).*

*Specific comments were received on every policy in this Chapter (Policies SDC1, SDC2 and SDC3) as well as general observations on sustainable design and construction.*

- Support for the need to encourage sustainable energy provision.
- Support for the tightening of water usage requirements.
- Objections to requiring higher than national requirements.

Detailed amendments made to the chapter and policies to address comments and technical suggestions received.

## Early Engagement Consultation (Regulation 18): July – September 2019

### Main Issues

### How this was taken into account?

#### Environmental Protection:

*Comments were received from 19 individuals and organisations/businesses on the Environmental Protection Chapter. These included comments from one individual at events and eight responses to the set survey questions. In addition, detailed comments were received from eight organisations and businesses, including from West Sussex County Council, Gatwick Airport Limited, The Woodland Trust, CPRE Sussex, Environment Agency, the Ifield Society, Town Access Group and one agent on behalf of developer/landowner.*

*Specific comments were received on paragraph 15.18 and Policies EP1, EP2, EP3 and EP4 as well as general observations on Environmental Protection.*

- Support for the flooding policies.
- Concerns regarding air quality – particularly in relation to air and road transport, as well as from Pease Pottage compost facility.
- Concern regarding noise pollution – particularly in relation to air and road transport, including from landowners affected and from GAL, who particularly drew attention to two of the housing allocations in the Plan (Steers Lane and Heathy Farm, both Forge Wood Residual Sites).

Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current national and local environmental health advice.

#### Sustainable Transport:

*Comments were received from 48 individuals and organisations/businesses on the Sustainable Transport Chapter. These included comments from 20 individuals at events and 10 responses to the set survey questions. In addition, detailed comments were received from 18 organisations and businesses, including from Metrobus, Network Rail, Surrey County Council, Home Builders Federation, Manor Royal BID, West Sussex County Council, Sussex Ornithological Society, Gatwick Airport Limited, The Woodland Trust, Sussex Wildlife Trust, CPRE Sussex, the Ifield Society, Town Access Group and five agents on behalf of developer/landowners.*

*Specific comments were received on paragraphs 16.1, 16.14 and on every policy in this Chapter (Policies ST1, ST2, ST3 and ST4).*

- Support for sustainable transport – strong support for the bus network and Fastway and improvements strongly supported.
- Need to improve the cycle network and pedestrian access in the town.
- Concern about existing road and junction capacity.
- Support and objections to the principle of a Crawley Western Relief Road (tied to whether there was support or objection to potential urban extensions to the west of Crawley), and some detailed concerns regarding the alignment from landowners affected and Gatwick Airport Limited.

Detailed amendments made to the chapter and policies to address comments and technical suggestions received reflect the current highways advice and local and corporate sustainability approach.

Parking Standards have been updated to incorporate the most up-to-date West Sussex evidence and these have been developed into a new Parking Standards Annex for the Local Plan.

Reference in the Plan to the “Relief” road has been amended to the “Link” road, as this is felt better reflects the purpose of the road.

The plan of “area of search for the Crawley Western Link Road” has been amended to show the correct area to the A23 north of County Oak.

## 2. Initial Publication Consultation (Regulation 19): January – March 2020

Initial Publication Consultation (Regulation 19): January – March 2020	
Main Issues	How this was taken into account?
<p><b>Local Plan General &amp; Vision</b></p> <p><i>General comments on the Local Plan and its vision were received from four representors. These included neighbouring local authorities, national government agencies, developers and specific interest groups: Reigate and Banstead Borough Council, Environment Agency, Quod and Sussex Wildlife Trust.</i></p> <p><i>Comments were received on the strategic approach to housing, economy and the environment.</i></p>	
<ul style="list-style-type: none"> <li>Request from Reigate and Banstead Borough Council to amend references to Housing Market Areas and overlaps between them in relation to <b>paragraph 2.26</b>.</li> <li>The Environment Agency question whether the issue of stress on sewage infrastructure is being included in the Local Plan or not.</li> <li>The Sussex Wildlife Trust support the Vision and suggest further additional amendments.</li> </ul>	<p>CBC believes the references in paragraph 2.26 reflect the most up-to-date evidence relating to the Housing Market Area, set out in the Northern West Sussex Strategic Housing Market Assessment, 2019 (Submission Document Reference: H/HN/01) pages 14-21.</p> <p>Paragraph 8.11 of the Reasoned Justification to Policy IN1: Infrastructure Provision (Submission Document Reference: CBLP/01) includes commentary on the specific issue of Waste Water Treatment capacity, reflecting findings of the Water Cycle Study and advises early consultation with Thames Water.</p> <p>Local Plan Schedule of Suggested modifications, July 2023 (Submission Document Reference: CBLP/07) includes a proposed hyperlink to Thames Water's pre-planning enquiry service.</p> <p>Support for the Vision is noted. The proposed amendments have not been taken forward in the Vision, as this would further lengthen the text, Vision, page 18 (Submission Document Reference: CBLP/01). However, the principles suggested are not disagreed with and the Vision when read as a whole and in relation to the content of the Local Plan seeks to deliver these objectives (reducing the need to travel and securing connectivity and ecological networks to protected sites and biodiversity net gains).</p>
<p><b>Sustainable Development</b></p> <p><i>Comments on this Chapter were received from 25 representors. These included those from neighbouring local authorities, national government agencies, landowners and planning agents, businesses and specific interest groups: Highways England, St. Catherine's Hospice, Historic England, Environment Agency, Rainier Developments Ltd, Sport England, West Sussex County Council, Sussex Wildlife Trust, LRM Planning Limited, Legal &amp; General, Sport England, Horsham District Council, Ardmore Ltd, UK Commercial Property Finance Holdings Ltd, Wilky Group, Natural England, HX Properties Ltd, Montagu Evans on behalf of Homes England, Tandridge District Council, Quod, Reigate and Banstead Borough Council, Mole Valley District Council, Mid Sussex District Council, Gatwick Airport Ltd and LRM Planning Limited.</i></p> <p><i>Comments were received in relation to Policies SD1, SD2 and SD3.</i></p>	
<ul style="list-style-type: none"> <li>The strategic objectives in <b>Policy SD1: Presumption in Favour of Sustainable Development</b> were criticised by The Hospice due to repetition elsewhere in the Plan, whilst</li> </ul>	<p><u>Policy SD1: Presumption in Favour of Sustainable Development</u></p> <p>Crawley Borough Council (CBC) disagree with the criticism that the strategic objectives in Policy SD1</p>

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Main Issues	How this was taken into account?
<p>the heritage objective was supported by Historic England, and the Environment Agency wanted an additional objective about water resources added.</p> <ul style="list-style-type: none"> <li>Highways England flagged the importance of Transport Assessments, both for the Local Plan and individual sites.</li> </ul>	<p>constitute repetition elsewhere in the Local Plan. This Policy is a Strategic overarching policy, based on national policy and sets the context of Sustainable Development within Crawley borough. The subsequent Local Plan policies reflect this.</p> <p>The support for the reference to the heritage objective is noted.</p> <p>A specific objective on water resources was not added, as CBC considers that this is a specific matter which is covered by the other strategic objectives (1. Adapts to Climate Change; 4. Crawley's Green Infrastructure; and 5. Safe and Secure Environment, as well as 7. Accords with the policies and objectives set out in the Local Plan).</p>
<ul style="list-style-type: none"> <li>Respondents, including WSCC Public Health team and Sport England support <b>Policy SD2: Enabling Healthy Lifestyles and Wellbeing</b>, with some minor wording changes suggested by some.</li> </ul>	<p><u>Policy SD2: Enabling Healthy Lifestyles and Wellbeing</u> Support for Policy SD2 is noted.</p>
<ul style="list-style-type: none"> <li>GAL, and Legal and General, owners of an extensive landholding in Mole Valley, objected to the removal of safeguarding citing the Aviation 2050 consultation document which states it is "prudent to continue to safeguard". GAL argues <b>Policy SD3: North Crawley Area Action Plan</b> is contrary to existing and emerging aviation and national planning policy which requires the continuation of safeguarding, and that the land is not required to meet employment needs which can be satisfied elsewhere in the borough, including within the airport and in neighbouring districts.</li> <li>Landowners with sites within the Area Action Plan (AAP) area supported the removal of safeguarding, and the designation of the AAP area through <b>Policy SD3</b>. Representatives cited the Government support of expansion at Heathrow to argue that there is no national policy need for continued safeguarding at Gatwick.</li> <li>Varying amounts of supporting information was provided by different landowners in promotion of their specific sites particularly for employment use, for which unmet need was highlighted, in response to draft <b>Policy SD3</b>.</li> <li>Some landowners argued that the AAP should include provision for other uses including airport parking, and for temporary uses and small scale development to be acceptable whilst the AAP was under preparation.</li> <li>Some landowners objected to the inclusion of previously unsafeguarded land within the AAP boundary.</li> <li>Owners of land east of Gatwick supported the AAP but also proposed an alternative approach</li> </ul>	<p><u>Policy SD3: North Crawley Area Action Plan (Gatwick Airport Safeguarded Land):</u> Policy SD3 and the proposal for preparing an Area Action Plan was deleted from the draft Local Plan following the 2020 initial Local Plan Regulation 19 consultation (Submission Document Reference: CBLP/04).</p> <p>Topic Paper 2: Gatwick Airport, section 2.2 (Submission Document Reference: DS/TP/02) summarises the national policy context for safeguarding for a potential future southern runway at Gatwick.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan evolved following the Initial Regulation 19 Consultation.</p> <p>The approach of partial safeguarding retention alongside the allocation of a Strategic Employment Site has been taken forward (Submission Document Reference: CBLP/01).</p>

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**Main Issues**

**How this was taken into account?**

- with partial safeguarding, and the release of their site for employment use.
- Several landowners requested more specific details on timelines for the AAP or suggested that the AAP should be brought forward in parallel with the preparation of the Local Plan. Other landowners argued that the Plan itself should allocate strategic sites to avoid delay in identifying and meeting economic needs.
- Sussex Wildlife Trust raised concern about the commitment to development in the area without this being considered alongside the Crawley and Horsham emerging Local Plans.
- Mole Valley District Council argued the AAP should be brought forward to determine the amount of housing the area could accommodate, and Mid Sussex District Council argued that the area offered the opportunity to consolidate employment land and release underused employment sites elsewhere for housing.
- Horsham District Council supported the AAP policy but suggested that reference needed to be made to the need to liaise closely with HDC because safeguarding extends into Horsham District.
- Tandridge District Council raised concerns about the impact of development in the AAP area on infrastructure, particularly transport, and sought involvement in future consultations.
- Sport England considered that any land or buildings in sport or recreation use with the AAP area should be retained unless proven to be surplus, or replaced, and Historic England flagged the need for account to be taken of heritage assets.

**Character, Landscape & Development Form**

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

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

- Support for the retention of **Policy CL1: Neighbourhood Principle**, as its origin comes from the original new town spatial strategy and is a distinguishing characteristic of the town.
- Suggested change to **Policy CL1** so it states that higher density will be encouraged where it is situated in sustainable locations (as opposed to stating higher density ‘may be compatible’).

Policy CL1: Neighbourhood Principle  
Support noted for Policy CL1: Neighbourhood Principle.  
High density in sustainable locations is covered in Policies CL2-CL5 (Submission Reference Document: CBLP/01).

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Support for the combination under one chapter of character, the design of new development and landscape character.</li> </ul>	
<ul style="list-style-type: none"> <li>Support for <b>Policies CL2 – CL5</b> which require the form of new development to reflect the defining characteristics of each neighbourhood.</li> <li>Representation that <b>Policy CL2: Making Successful Places: Principles of Good Urban Design</b> makes no reference to the National Design Guide.</li> <li>Suggestion that <b>Policy CL2</b> should set out the minimum density ranges.</li> <li>Respondents encouraged to see their amendments have been incorporated.</li> </ul>	<p><u>Policies CL2 – CL6</u> Strategic Policy CL2, paragraph (g) and Policy CL4 states all major development, where appropriate and subject to Policy CL3, need to maximise opportunities for compact development and increased residential density.</p> <p>Support is noted for Policies CL2-CL6, including in relation to Manor Royal.</p> <p>The chapter's 'Key Issues' section was updated to refer to latest government guidance.</p> <p>Minimum density standards are set out in Policy CL5: Form of New Development – Layout Scale and Appearance (Submission Document Reference: CBLP/05).</p>
<ul style="list-style-type: none"> <li>Concern, despite clarification within the supporting text to <b>Policy CL3: Local Character and the Form of New Development</b>, that all new development, such as minor alterations or smaller scale development will be required to support the council in bringing forward area wide character assessments.</li> <li>Homes England raised concerns that a number of new requirements including the support of area wide character assessment, framework plans and development briefs, design codes and three-dimensional masterplans, is too onerous and could delay development coming forward.</li> <li>In regard to <b>Policy CL3</b> and character assessment, Homes England reiterated that preparation of such work is not an effective use of the council's own resources and it should be for the landowner or developer to lead on.</li> <li>Support for <b>Policy CL3</b>, particularly in its reference to protecting, enhancing and reinforcing 'heritage assets and their settings'.</li> <li>In respect of a future extension to Manor Royal, suggestion that character assessment should form part of the Area Action Plan process.</li> </ul>	<p><u>Policy CL3: Local Character and the Form of New Development:</u> The policy does not require applicants to support the council in bringing forward Area Wide Character and Design Assessments. Policy CL3, paragraph 2 (Submission Document Reference: CBLP/01) only notes the importance of such evidence in relation to new large-scale development.</p> <p>The importance of existing character is noted in the National Planning Framework (2021), Chapter 12 paragraphs 127 and 130 (c), the National Design Guide (MHCLG 2019) and the National Design Code (2021). The latter outlines guidance on how this can be achieved.</p> <p>Paragraph 134 and 128 -129 of the NPPF outlines both the value and requirement that local authorities produce design guides and codes. Such guides and codes are not too onerous, and the National Model Design Code and Guide should be used in the absence of locally produced versions.</p> <p>Chapter 12, paragraph 129 of the NPPF also states that for locally based design guides and codes to carry weight in decision-making they should be produced either as part of a plan or as supplementary planning documents, and as such they are an effective use of council resources.</p>
<ul style="list-style-type: none"> <li>Agreement that <b>Policies CL4-CL6</b> set out a series of design parameters that will help to ensure that high-quality sustainable design is achieved.</li> <li>Representation on <b>Policy CL4: Effective Use of Land: Sustainability, Movement and Layout</b>, minimum walking distances in relation to enabling higher density, that the 5 – 8 minute time stated is incorrect and should be</li> </ul>	<p><u>Policy CL4: Effective Use of Land: Sustainability, Movement and Layout</u> The National Model Design Code and Guide outlines the rationale behind maximum walking distances and density ranges. This national guidance is based upon comprehensive evidence, including Transport for London's 'Public Transport Accessibility Levels' (PTALs) and the Urban Design Compendium's walkable neighbourhood's chapter; 3.2.1 the neighbourhood unit.</p>

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<b>Main Issues</b>	<b>How this was taken into account?</b>
<p>increased, thus opening up more land for higher density ranges.</p> <ul style="list-style-type: none"> <li>Request clearer cross reference to <b>Policy CL4</b> which specifies minimum densities.</li> </ul>	<p>For new compact places/higher residential densities to function well and be acceptable to existing communities, specific public transport infrastructure needs to be located within evidence based maximum walking distances, as outlined in section 4.45 and Policy CL4 of the 2020 draft Local Plan (Submission Document Reference CBLP/05).</p>
<ul style="list-style-type: none"> <li>Comment regarding <b>Policy CL5: Form of New Development – Layout, Scale and Appearance</b> and density ranges; that it would be more effective if it was exactly identified where proposed density ranges would apply.</li> <li>Representation that a densification study is prepared which will consider, amongst other things, appropriate densities and potential locations.</li> <li>Representation in regard to <b>Policy CL5</b> and the use of master planning and development briefs; that a more appropriate threshold is made before they are applicable.</li> </ul>	<p><u>Policy CL5: Form of New Development – Layout, Scale and Appearance</u> This policy specifies that a minimum density range threshold applies across the borough (subject to CL2 and CL3). Policy CL5 paragraph (e) identifies suitable locations for higher density ranges such as the Town Centre (Submission Document Reference: CBLP/05).</p> <p>Following this consultation, a Compact Residential Development Study, May 2023, was prepared which provides the background and rational for how density range thresholds can be determined (Submission Document Reference: WC/CLD/01).</p>
<ul style="list-style-type: none"> <li>Suggestion from the landowner to remove the designation of <b>Policy CL6: Structural Landscaping</b> to some areas.</li> </ul>	<p><u>Policy CL6: Structural Landscaping</u> The Structural Landscaping designation has been retained from the existing adopted Local Plan: Crawley 2030, December 2015, Policy CH7 (Submission Document Reference: CBLP/02) which was found sound through the previous Local Plan Examination (Submission Document Reference: CBLP/03).</p> <p>The protection of existing character is considered essential. This is covered within the Compact Residential Development Study, Chapter 4 (Submission Document Reference: WC/CLD/01) Existing Character Assessment is addressed in Policy CL2.</p>
<ul style="list-style-type: none"> <li>Comments were received in relation to <b>Policy CL8: Development Outside the Built-Up Area Boundary</b>, requesting the protection of West of Ifield Rural Fringe with acknowledgement of nature importance and protect Local Wildlife Sites from development e.g. Worth Way, as well as comments requesting positive amendments to the Policy to encourage some development outside Built-Up Area Boundary.</li> </ul>	<p><u>Policy CL8: Development Outside the Built-Up Area Boundary</u> The Local Plan should be read as a whole and Policies GI1, GI2, GI3 and GI4 apply to the Ifield Rural Fringe.</p> <p>Paragraph 4.70 of the Submission Local Plan has since been inserted into the Reasoned Justification to this policy to address the concerns raised in relation to development outside the Built-Up Area boundary as urban extensions.</p> <p>The protection of existing character is considered essential. This is covered within the Compact Residential Development Study, Chapter 4 (Submission Document Reference: WC/CLD/01) Existing Character Assessment is addressed in Policy CL2.</p>

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### Main Issues

### How this was taken into account?

#### Design & Development Requirements

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

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

- Representations were received to suggest that both the compensation for replacement trees does not go far enough in **Policy DD5: Tree Replacement Standards**, and that the financial compensation for replacement trees is considered unviable.

#### Policy DD5: Tree Replacement Standards

Policy DD5 is based on the adopted Local Plan: Crawley 2030, December 2015, Policy CH6 (Submission Document Reference: CBLP/02) which was found sound through the previous Local Plan Examination (Inspector's Report paragraph 97, Submission Document Reference: CBLP/03). It has been successfully implemented since the publication of the Green Infrastructure SPD (as set out in the Crawley Local Plan Authority Monitoring Report 1 April 2020 – 31 March 2021 (Submission Document Reference: CB/AMR/02).

It is in addition to Submission Policy GI3: Biodiversity and Net Gain, which includes the opportunities for additional new tree planting as part of the ways in which to achieve Biodiversity Net Gain from new developments.

Both of these requirements were considered as part of the whole Local Plan and Community Infrastructure Levy Viability Assessment which concluded the Local Plan as a whole, including the requirements set out in the Planning Obligations Annex, is viable (Submission Document References: DS/VA/01a, DS/VA/01b, DS/VA/02a and DS/VA/02b).

- GAL support for inclusion of a standalone policy for aerodrome safeguarding (**Policy DD6**), and suggested several text amendments.

#### Policy DD6: Aerodrome Safeguarding

Support is noted.

Suggested amendments were factored into the policy and supporting text prior to the Additional Local Plan Regulation 19 consultation (2021) (Submission Document Reference: CBLP/04).

#### Heritage

*Comments on this Chapter were received from three representors. These included a national government agency, a planning agent representing a landowner and a specific interest group: Historic England, St Catherine's Hospice and Ifield Village Conservation Area Advisory Committee.*

*Comments were received on Policies HA1, HA2, HA4, HA6 (support) and HA7.*

- Suggested changes to **Policy HA1: Heritage Assets** to refer to protections for designated heritage assets in the NPPF.

#### Policy HA1: Heritage Assets

Policy HA1: Heritage Assets has been amended to more closely reflect national policy in relation to the Historic Environment (Submission Document Reference: CBLP/01).

- Support for policies relating to designated Heritage Assets (i.e. **Policies HA2; Conservation Areas, HA4: Listed Buildings,**

Expressions of support are noted.

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Main Issues	How this was taken into account?
<b>HA7: Heritage Assets of Archaeological Interest).</b>	
<ul style="list-style-type: none"> <li>Representation on <b>Policy HA2: Conservation Areas</b> recommending greater support for well designed, innovative, high-density development where it improves the setting.</li> </ul>	<u>Policy HA2: Conservation Areas</u> CBC does not consider that amendment of Policy HA2: Conservation Areas to express ‘in principle’ support for higher density and innovative development is appropriate, given the role of the policy. Policies CL2-CL5 support well designed, innovative, compact development in all locations where appropriate.
<ul style="list-style-type: none"> <li>Ifield Village Green should be included as a Park &amp; Garden under <b>Policy HA6: Historic Parks and Gardens.</b></li> </ul>	<u>Policy HA6: Historic Parks and Gardens</u> Ifield Village Green was considered for identification as a Historic Park & Garden in the 2020 Heritage Assets Review (Appendix B1: Historic Parks and Gardens) (Submission Document Reference: WC/H/04) and was not found to meet appropriate criteria. It already benefits from significant protection as a recognised asset within a Conservation Area.
<p><b>Open Space, Sport &amp; Recreation</b></p> <p><i>Comments on this Chapter were received from five representors. These included neighbouring local authorities, national government agencies and specific interest groups: Horsham District Council, Ifield Village Conservation Area Advisory Committee, Mid Sussex District Council, Sport England and Sussex Wildlife Trust.</i></p> <p><i>Comments were received on Policies OS1 and OS2.</i></p>	
<ul style="list-style-type: none"> <li>Comments received on <b>Policy OS1: Open Space, Sport and Recreation</b> suggest that surplus open space should support meeting housing needs whilst improving recreational opportunities (to reflect <b>Policy H3f: Housing Typologies – Open Spaces</b>).</li> <li><b>Policy OS1</b> should cross-reference to <b>Policy SD3: North Crawley Area Action Plan</b>, to maximise opportunities to utilise land within the Gatwick Safeguarded area for open space in order to releasing land for housing.</li> </ul>	<u>Policy OS1: Open Space, Sport and Recreation</u> Policy OS1: Open Space, Sport and Recreation sets out that any loss of open space must be surplus to requirements. This is in accordance with paragraph 99 of the NPPF (2021).  Policy SD3 has been deleted following the Initial Local Plan Regulation 19 consultation (2020).
<ul style="list-style-type: none"> <li>Support for amendments made to <b>Policy OS2: Provision of Open Space and Recreational Facilities.</b></li> </ul>	<u>Policy OS2: Provision of Open Space and Recreational Facilities</u> Support for the amendments made to Policy OS2: Provision of Open Space and Recreational Facilities is noted.
<p><b>Infrastructure Provision</b></p> <p><i>Comments on this Chapter were received from 12 representors. These included three local residents, national government departments and agencies, the county council, utilities providers, landowners and planning agents, and businesses: Thames Water Utilities Ltd, Department of Education, St Catherine’s Hospice, LRM Planning Ltd, Crawley CCG, Environment Agency, Gatwick Airport Ltd, West Sussex County Council and Highways England.</i></p> <p><i>Comments were received on Policies IN1, IN2 and IN3.</i></p>	
<ul style="list-style-type: none"> <li>General concerns about infrastructure impacts of new development and importance of recognising various assets (e.g. the hospital) as part of infrastructure provision.</li> </ul>	The overall approach set out in Policies IN1: Infrastructure Provision and IN2: The Location and Provision of New Infrastructure seeks to ensure that

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Thames Water concerns around timing of new development in relation to upgrades to WWTW that may be required.</li> <li>• Comments on <b>Policy IN1: Infrastructure Provision</b> regarding Education: supportive of S106 for education (though this has now been removed); seeking more scope for use of S106 including back-funding of schemes already delivered, and removal of requirement that specific schemes be identified. Highlights importance of planning for school growth and role of statement of common ground.</li> <li>• <b>Policy IN1</b> should require provision of any additional infrastructure required to support airport expansion.</li> <li>• Concerns as to whether <b>Policy IN1</b> is sufficiently flexible to allow reprovision outside the borough where appropriate for the kind of facility in question.</li> <li>• Comments on <b>Policy IN1</b> seeking greater priority for medical facilities in terms of CIL spend.</li> <li>• Recommendation for water quality monitoring requirements via S106 and greater attention to water quality.</li> <li>• Representation seeking clearer support for expansion of waste water facilities where required.</li> </ul>	<p>development is supported by the necessary infrastructure.</p> <p><u>Policy IN1: Infrastructure Provision</u> Paragraph 8.11 of the Reasoned Justification to the Policy (Submission Document Reference: CBLP/01) includes commentary on the specific issues of Waste Water Treatment capacity, reflecting the findings of the Water Cycle Study and advises early consultation with Thames Water.</p> <p>Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 7, includes a proposed hyperlink to Thames Water's pre-planning enquiry service.</p> <p>Earlier proposals to charge tariff-based S106 contributions towards Education have been removed from the Planning Obligations Annex in response to the findings from the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/02a) that these contributions in addition to CIL could not be viably supported.</p> <p>Education infrastructure required to support development within Crawley will be eligible for contributions from CIL. S106 contributions for Education may still be required in special circumstances – e.g. strategic residential development.</p> <p>Despite considerable joint work and effort it has not been possible to identify a suitable site for the proposed Forge Wood High School within the tightly-drawn administrative boundaries of the borough, although proposed Policy IN2 allows for educational facilities to be provided on sites allocated for residential development.</p> <p>The latest position in respect of secondary Educational needs is set out in the Infrastructure Plan, July 2023 (Submission Document Reference: KD/IP/01) and the Northern West Sussex Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/01).</p> <p>The approach to infrastructure required to support airport expansion is set out in Policies GAT1, GAT2, GAT3 and GAT4 as well as Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02).</p> <p>CBC considers that Policy IN1 is drafted sufficiently flexibly to allow for replacement infrastructure to be delivered outside the administrative boundary of the borough where suitable.</p> <p>Medical facilities will be eligible for CIL subject to the identification of suitable projects. Some GP surgery expansions are identified as potential</p>

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Main Issues	How this was taken into account?
	<p>recipients of CIL funding in the council's Infrastructure Business Plan.</p> <p>Policy IN1 does not seek to be comprehensive in identifying cases/issues which might be subject to Planning Obligations but rather to set out broad principles.</p> <p>Policy EP3: Land and Water Quality provides a basis for consideration of impacts on water quality and for appropriate mitigation.</p>
<ul style="list-style-type: none"> <li>• <b>Policy IN2: The Location and Provision of New Infrastructure</b> provisions allowing for education facilities on a site allocated for uses including housing are not considered sufficiently flexible.</li> </ul>	<p><u>Policy IN2: The Location and Provision of New Infrastructure</u></p> <p>CBC considers that the approach set out in the Policy is adequate to provide sufficient support for necessary waste water or other infrastructure facilities without more specific detail being required.</p> <p>The Policy has been amended to give more support to the use of land allocated for residential use for educational purposes where there is a demonstrated need that cannot be met on another site.</p>
<ul style="list-style-type: none"> <li>• Support for <b>Policy IN3: Supporting High Quality Communications</b>: WSCC support for policy approach to ensuring that development is future-proofed to be gigabit capable, full-fibre ready; and resident support for the inclusion of a digital communication infrastructure policy.</li> </ul>	<p><u>Policy IN3: Supporting High Quality Communications</u></p> <p>Support welcomed.</p>
<p><b>Economic Growth</b></p> <p><i>Comments on this Chapter were received from 18 representors. These included local residents, national government departments and agencies, neighbouring local authorities, landowners and planning agents, businesses and specific interest groups: Horsham District Council, Surrey County Council, Ardmore Ltd, UK Commercial Property Finance Holdings Ltd, Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group, Homes England, Quod, Gatwick Airport Ltd, Mole Valley District Council, Mid Sussex District Council, Wilky Group, Reigate and Banstead Borough Council, Universities Superannuation Scheme, Bellway Homes Ltd, HX Properties, Caravan and Motorhome Club and Sussex Wildlife Trust.</i></p> <p><i>Comments were received on Policies EC1, EC2, EC3, EC4, EC6, EC10 and EC12.</i></p>	
<ul style="list-style-type: none"> <li>• Support <b>Policy EC1: Sustainable Economic Growth</b> approach of maximising use and intensification of existing main employment areas for economic development, protecting Manor Royal for business-led uses, and identifying small extensions to Manor Royal that would support the delivery of business land and floorspace.</li> <li>• A range of views on the principle of a North Crawley Area Action Plan to consider the scope for a Strategic Employment Location. Some site promoters were supportive of the approach, whilst others felt that the Local Plan should be more pro-active and allocate site(s) without the need for an AAP. These parties suggested that Crawley should be planning for the higher</li> </ul>	<p><u>North Crawley Area Action Plan</u></p> <p>Noted that a range of feedback has been received in relation to this draft policy. The approach taken to the North Crawley Area Action Plan is detailed in Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02). Section 2.2 summarises the national policy context for safeguarding for a potential future southern runway at Gatwick Airport.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan (Submission Document Reference: CBLP/01) evolved following the Initial Local Plan Regulation 19 Consultation (Submission Document Reference: CBLP/05).</p>

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Main Issues	How this was taken into account?
<p>Baseline Labour Supply figure of 113ha employment land.</p> <ul style="list-style-type: none"> <li>• Gatwick Airport objected to the principle of a Strategic Employment Location on the safeguarded land, considering that the council should instead plan for the lower 'continuation of past trends' figure of 33ha business land through the intensification of existing main employment areas and use of Article 4 Directions.</li> <li>• A site promoter submitted detail of an employment site that it wishes to see allocated by MVDC to accommodate Crawley's unmet employment needs. Mole Valley DC advised that it is unable to help accommodate Crawley's unmet business land needs due to physical constraints and it having little relationship to the Northern West Sussex Functional Economic Market Area.</li> <li>• RBBC outlined that given the focus of the allocated Horley Strategic Business Park, there is no unmet need for offices from Crawley. RBBC confirmed it is not in a position to accommodate any of Crawley's unmet industrial or warehouse needs and advised that meeting this need should be the focus of any SEL allocated through an AAP.</li> </ul>	<p><u>Policy EC1: Sustainable Economic Growth</u> Support welcomed re: protecting and maximising use of existing main employment areas for economic growth, and for identifying small business land extensions to Manor Royal.</p> <p><i>Employment Figures</i> The council's approach to identification of economic need is discussed in detail in Topic Paper 5: Employment Needs and Land Supply (Submission Document Reference: DS/TP/05). Section 4 summarises evidence from the Northern West Sussex Economic Growth Assessment 2020 (Submission Document Reference: EGSM/EG/07) and its Crawley focused updates 2020 (Submission Document Reference: EGSM/EG/06) and 2023 (Submission Document Reference: EGSM/EG/05).</p> <p>It is noted that MVDC and RBBC have stated they are unable to accommodate Crawley's unmet business land needs.</p>
<ul style="list-style-type: none"> <li>• Support for the <b>Policy EC2: Economic Growth in Main Employment Areas</b> approach of protecting and making efficient use of main employment areas for economic growth.</li> <li>• One representation suggested there should be greater flexibility to allow residential uses in main employment areas.</li> <li>• Gatwick Airport objected to the development of existing main employment areas that are currently within the safeguarded land. It advised that there is land available at the airport to help meet Crawley's employment needs.</li> </ul>	<p><u>Policy EC2: Economic Growth in Main Employment Areas</u> CBC disagree with the request for greater flexibility to allow residential in main employment areas, as it is important to protect the economic function of these areas, particularly given the borough's constrained employment land supply position.</p> <p>Disagree with Gatwick Airport point on Lowfield Heath – this is an existing main employment area, and safeguarding policy will continue to apply in this location. The Plan should be read as a whole, and this point is covered in supporting text and under Policy GAT2 (Submission Document Reference: CBLP/01).</p>
<ul style="list-style-type: none"> <li>• Support for the <b>Policy EC3: Manor Royal</b> approach of protecting Manor Royal, and maximising the efficient use of land, for business-led employment.</li> <li>• Support for <b>Policy EC4: Employment and Skills Development</b>, but it was questioned how this would be applied for applications, specifically for speculative developments.</li> </ul>	<p><u>Policy EC3: Manor Royal &amp; EC4: Employment and Skills</u> Support for these policies is noted.</p> <p>Clarification as to how contribution will be applied is set out in the Planning Obligations Annex (Submission Document Reference: CBLP/01, pages 274-294).</p>
<ul style="list-style-type: none"> <li>• In relation to <b>Policy EC6: Visitor Accommodation</b>, Holiday Extras is of the view that a 'needs' test should be applied for hotel and visitor accommodation located on-airport, for consistency with the <b>Policy GAT2</b> requirement that additional on-airport parking is</li> </ul>	<p><u>Policy EC6: Hotel &amp; Visitor Accommodation</u> Text amendments have been made regarding application of sequential test.</p> <p>Clarification has been added regarding the approach to hotel and visitor accommodation.</p>

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Main Issues	How this was taken into account?
<p>justified by a demonstrable need. Caravan Club objection to sequential test being applied to visitor accommodation.</p> <ul style="list-style-type: none"> <li>GAL objected to the application of a sequential test to hotel and visitor accommodation within the airport boundary, noting that this is a sustainable location for hotels given the nature of the users (i.e. in relation to flights). Advised that hotel provision within the airport boundary should be exempt from the sequential text.</li> </ul>	
<ul style="list-style-type: none"> <li><b>Policy EC10: Employment Development and Residential Amenity</b> was supported by the Goods Yard operators.</li> </ul>	<p><u>Policy EC10: Employment Development &amp; Residential Amenity</u> Support is noted.</p>
<ul style="list-style-type: none"> <li>Request to add reference in <b>Policy EC12: Rural Economy</b> to protecting connectivity of the green infrastructure network.</li> </ul>	<p><u>Policy EC12: Rural Economy</u> Additional wording has been added to Policy EC12 to pick up on the request in the representation relating to protecting connectivity of the green infrastructure network.</p>
<p><b>Gatwick Airport</b></p> <p><i>Comments on this Chapter were received from 14 representors. These included local residents, neighbouring local authorities, utilities providers, landowners and planning agents, businesses and specific interest groups: Thames Water Utilities Limited, Gatwick's Big Enough, CAGNE, Gatwick Area Conservation Campaign, UK Commercial Property Finance Holdings Ltd, Reigate &amp; Banstead Borough Council, Environment Agency, Sussex Wildlife Trust, Gatwick Airport Ltd, LRM Planning Limited, HX Properties Ltd, Quod and Wilky Group.</i></p> <p><i>Comments were received on Policies GAT1, GAT2 and GAT3.</i></p>	
<ul style="list-style-type: none"> <li>A number of representations to <b>Policy GAT1: Development of the Airport with a Single Runway</b> objected to the possible growth of Gatwick Airport via the DCO process, which is beyond the remit of the Local Plan.</li> <li>Some respondents felt <b>Policy GAT1</b> did not do enough to control growth at the airport, and a cap on passenger numbers was suggested.</li> <li>Support for the lifting of safeguarding from various employment site promoters, and Thames Water in relation to the need to expand Crawley WwTW.</li> <li>GAL suggested a number of policy amendments, including the removal of wording relating to the DCO process, and the addition of wording to keep safeguarding in place.</li> </ul>	<p><u>Policy GAT1: Development of the Airport with a Single Runway</u> Topic Paper 2: Gatwick Airport, section 3.2 (Submission Document Reference: DS/TP/02) sets out the council's consideration of matters raised in representations relating to Policy GAT1.</p> <p><u>Gatwick Airport Safeguarded Land</u> Topic Paper 2: Gatwick Airport, section 2.2 (Submission Document Reference: DS/TP/02) summarises the national policy context for safeguarding for a potential future southern runway at Gatwick Airport.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan (Submission Document Reference: CBLP/01) evolved following the Initial Local Plan Regulation 19 Consultation (Submission Document Reference: CBLP/05).</p>
<ul style="list-style-type: none"> <li>Various existing and new off-airport parking operators objecting to <b>Policy GAT2: Gatwick Airport Related Parking</b> and an objection from Wilky and Holiday Extras. Support for from GAL and RBBC for the policy approach.</li> </ul>	<p><u>Policy GAT2: Gatwick Airport Related Parking</u> Topic Paper 2: Gatwick Airport, section 3.7 (Submission Document Reference: DS/TP/02) explains the rationale and background the airport parking policy, including Local Plan and appeal Inspectors' decisions and the High Court judgement, and the relationship between the policy</p>

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Main Issues	How this was taken into account?
	and the Gatwick Airport s106 (Submission Document Reference: EGSM/GA/05) and the Surface Access Strategy (Submission Document Reference: EGSM/GA/09).
<ul style="list-style-type: none"> <li>General support for <b>Policy GAT3: Employment Uses</b> at Gatwick, the approach of allowing non-airport related employment uses where this would not prejudice ability of airport to meet its operational needs as it grows. Support from GAL for this approach.</li> </ul>	<u>Policy GAT3: Employment Uses</u> Support is noted.
<h3>Crawley Town Centre</h3> <p><i>Comments on this Chapter were received from four representors. These included neighbouring local authorities, developers and specific interest groups: Sussex Wildlife Trust, Rainier Developments Ltd, Horsham District Council and Reigate and Banstead Borough Council.</i></p> <p><i>Comments were received on Policies TC2, TC3 and TC5.</i></p>	
<ul style="list-style-type: none"> <li>Sussex Wildlife Trust want reference in <b>Policy TC2: Town Centre Neighbourhood Facilities</b> to accessible open space.</li> </ul>	<u>Policy TC2: Town Centre Neighbourhood Facilities</u> Reference has been added to Policy TC2 regarding accessible open space.
<ul style="list-style-type: none"> <li>Developer and HDC support for <b>Policy TC3: Development Sites within the Town Centre Boundary</b>. HDC keen to see a density study to ensure opportunities for residential in the TC are maximised.</li> </ul>	<u>Policy TC3: Development Sites within the Town Centre Boundary</u> Support is noted for Policy TC3.  Following the 2020 Local Plan Regulation 19 Consultation, the rational, parameters and justification for optimising and increasing compact development has been further evidenced in the Compact Residential Development Study, May 2023, to support the Submission Local Plan Policies (Submission Document Reference: WC/CLD/01).
<ul style="list-style-type: none"> <li>Minor amendments suggestions to <b>Policy TC5: Town Centre First</b> from RBBC.</li> </ul>	<u>Policy TC5: Town Centre First</u> Text has been added to Policy TC5 clarifying that Neighbourhood Parades are treated as Local Centres and not therefore subject to sequential or impact tests.
<h3>Housing Delivery</h3> <p><i>Comments on this Chapter were received from 30 representors. These included six local residents, neighbouring local authorities, national government departments and agencies, utilities providers, landowners and planning agents, businesses and specific interest groups: Danescroft (RLP Crawley) LLP, Home Builders' Federation, Highways England, Gladman Developments LTD, Sussex Ornithological Society, St Catherine's Hospice, Horsham District Council, Waverley Borough Council, Wood PLC on behalf of Homes England, Homes England, Persimmon Homes Plc, Mole Valley District Council, Sussex Wildlife Trust, Thames Water Utilities Limited, West Sussex County Council Property and Asset Management, The Bucknall Family, Rainier Developments Ltd, Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group, Surrey County Council, Bellway Homes Ltd, Environment Agency, Mid Sussex District Council, Gatwick Airport Ltd and CAGNE.</i></p> <p><i>Comments were received on Policies H1, H2, H3b, H3c, H3d, H3e, H3f and H3g.</i></p>	
<ul style="list-style-type: none"> <li>Objections to proposed Local Plan housing requirement on grounds of various environmental impacts, including biodiversity.</li> <li>Query whether sufficient infrastructure is in place to support the housing growth &amp; whether it will be possible to phase infrastructure in line with housing growth</li> </ul>	<u>Policy H1: Housing Provision</u> Policy H1 seeks to address Crawley's identified housing need as far as possible given the borough's limited supply of land and existing constraints, including key constraints recognised in National Planning Policy. The rationale of the approach is set out further in Topic Paper 4:

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Standard Method figure needs updating on basis of 2020 figures.</li> <li>• Proposed housing requirement is not enough to meet affordable housing need in the borough.</li> <li>• Concern raised that there is no agreement with neighbouring authorities about how Crawley's <b>unmet need</b> will be met through SoCG.</li> <li>• Coordination with neighbouring authorities is also needed to identify impacts on strategic road network if Crawley delivers its proposed housing requirement and Crawley's unmet needs are met 'at Crawley' – also combined with potential airport expansion and new employment sites in vicinity.</li> <li>• Absence of key evidence (Transport Assessment, Water Cycle Study, Heritage) means there is questionable basis for assuming that a 'supply based' housing requirement will end up at this level – query as to basis of conclusions in SA that higher housing requirement would have significant negative impacts.</li> </ul>	<p>Housing Supply (Submission Document Reference: DS/TP/04).</p> <p>The overall approach set out in Policies IN1: Infrastructure Provision and IN2: The Location and Provision of New Infrastructure seeks to ensure that development is supported by the necessary infrastructure.</p> <p>Policy H1 includes a calculation of need in accordance with the Standard Method, using a base year of 2023 and the 2022 median affordability ratio published in March 2023.</p> <p>The proposed housing requirement reflects the borough's limited supply of land and existing constraints. Further detail is provided in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04) while the Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the methodology for assessing sites and individual site assessments.</p> <p>The approach to engagement with neighbouring authorities in respect of Crawley's unmet housing need and the outcomes of this are set out in the Duty to Cooperate Statement, July 2023 (Submission Document Reference: KD/DtC/01) and the Northern West Sussex Housing Needs Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/02).</p> <p>The Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a) includes scenario testing for additional development "at Crawley".</p> <p>The Crawley Transport Modelling Study TN02 GAL Sensitivity Test, June 2023 (Submission Document Reference: ET/ST/01w) considers the impact of the current Gatwick Airport Northern Runway proposal subject to a Development Consent Order application.</p> <p>Duty to Cooperate discussions in respect of highways impacts are reflected in the Northern West Sussex Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/01), the Crawley Borough Council and National Highways Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/15a) and the Crawley Borough Council and West Sussex County Council Statement of Common Ground (Submission Document Reference: SoCG/16).</p> <p>The Crawley Transport Modelling Study, initially May 2021, and final June 2022 (Submission Document Reference: ES/ST/01a); Gatwick Sub-</p>

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Main Issues	How this was taken into account?
	<p>Region Water Cycle Study, August 2021 (Submission Document Reference: ES/SDC/08a); Addendum to the Water Cycle Study, January 2021 (Submission Document Reference: ES/SDC/08a) and Crawley Heritage Assets Review overarching document, December 2020 (Submission Document Reference: WC/H/01) together with associated appendices were all published in advance of the Further Publication Regulation 19 Consultation in 2023. As the evidence was emerging the findings were considered as an iterative part of the Local Plan preparation.</p> <p>The justification for the supply-led housing requirement is set out in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04) whilst the Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the methodology for assessing sites and individual site assessments.</p>
<ul style="list-style-type: none"> <li>• Objections/suggestions made about the approach to individual sites as potential housing sites: e.g. objecting to/ querying sites' exclusion from housing land supply, constraints placed on them, or the indicative dwelling quantum provided (<b>Steers Lane, Tinsley Lane, St Catherine's Hospice, Land East of Street Hill, additional parcels at Forge Wood</b>).</li> <li>• Objections/suggestions seeking to object to/query proposed housing sites or increase constraints on them or reduce dwelling quantum (<b>Land East of Street Hill, Former TSB Site Russell Way, West of Ifield</b>).</li> <li>• Objections to specific housing sites proposed owing to environmental impacts.</li> </ul>	<p><u>Policy H2: Key Housing Sites</u> Policy H2 sets out the key housing allocations and broad locations for housing, including specific policy requirements in relation to the development of some sites.</p> <p>The Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the methodology for assessing sites and individual site assessments.</p> <p>Policy H1: Housing Provision identifies areas to the north of Langley Green and Forge Wood as areas of search for residential development, as reflected in the Local Plan Key Diagram (page 17, Submission Document Reference: CBLP/01). Paragraph 1.36 confirms that should changes to national aviation policy allow for the removal of the safeguarding of all the land for Gatwick Airport expansion, the opportunities and constraints of this land will be considered comprehensively through a review of the Local Plan, rather than as piecemeal development.</p>
<ul style="list-style-type: none"> <li>• Query as to whether the identified 5-year land supply meets the deliverability definition in the NPPF.</li> <li>• Crawley should meet its housing need by building at higher densities and so avoid the need for development in surrounding rural districts which will do greater damage to biodiversity.</li> <li>• Approach needs more justification in terms of evidence that different types of opportunities have been explored: increased densities, estate regeneration, higher windfall allowance, surplus open space and industrial land.</li> </ul>	<p>Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04) includes Appendix A: 5-Year Housing Land Supply Statement, which identifies a 5-year housing supply in accordance with the NPPF deliverability definition, based on evidence as of May 2023.</p> <p>The council's approach of making effective use of land in order to maximise the potential for delivery of residential development, while respecting site constraints, is explained in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04) and the Crawley Compact Residential</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Housing requirement doesn't allow for possibility that safeguarding will be lifted, allowing for more development opportunities (<b>areas of search in Forge Wood/Langley Green</b>).</li> <li>Concern that tests for identifying additional opportunities to provide housing growth within Crawley are not more clearly defined.</li> </ul>	<p>Development Study, May 2023 (Submission Document Reference: WC/CLD/01). It is reflected in Policies CL2: Making Successful Places – Principles of Good Urban Design; CL3: Movement Patterns, Layout and Sustainable Design; CL4: Compact Development – Layout, Scale and Appearance; and CL5: Significant Development, Masterplanning and Design Success.</p> <p>The rationale of the proposed windfall allowance is set out in the Windfall Statement, May 2023 (Submission Document Reference: H/HN/06).</p> <p>Policies H1: Housing Provision; H2: Key Housing Sites and H3: Housing Typologies and the associated policies H3a-H3f seek to set out as far as possible how potential opportunities will be approached.</p>
<ul style="list-style-type: none"> <li>Various comments supporting/proposing modifications to <b>Policy H3g: Urban Extensions</b> (which has now been largely retained as commentary rather than as a policy).</li> <li>Objection to <b>Policy H3g</b> as not being justified or effective.</li> </ul>	<p>Policy H3g: Urban Extensions has been deleted, although some of the text has been retained in paragraph 12.23 as commentary (Submission Document Reference: CBLP/01).</p>
<p><b>Meeting Housing Needs</b></p> <p><i>Comments on this Chapter were received from nine representors. These included neighbouring local authorities, landowners, developers and planning agents, businesses and specific interest groups: Gladmans Development Ltd, Catherine's Hospice, Rainier Developments Ltd, Bellway Homes Ltd, Persimmon Homes Ltd, Home Builders' Federation, Tetlow King Planning, Rentplus UK Ltd, Gatwick Airport Ltd and Reigate and Banstead Borough Council.</i></p> <p><i>Comments were received on Policies H4, H5, H7 and H8.</i></p>	
<ul style="list-style-type: none"> <li><b>Policy H4: Housing Mix</b> should be made more flexible, particularly regarding private units.</li> </ul>	<p><u>Policy H4: Housing Mix</u> CBC considers that there is a need for clear requirements in Policy H4: Housing Mix in order to support the effectiveness of the Policy.</p> <p>Monitoring, as set out in Crawley Local Plan Authority Monitoring Report 1 April 2020 – 31 March 2021 (Submission Document Reference: CB/AMR/02) has indicated that provision of smaller open market residential dwellings in recent years has been well in excess of local demand and at the expense of providing family sized accommodation which is identified as needed within the borough in the Northern West Sussex Strategic Housing Market Assessment, November 2019 (Submission Document Reference: H/HN/01).</p>
<ul style="list-style-type: none"> <li>Objection to <b>Policy H5: Affordable Housing</b> as not meeting NPPF threshold requirement and not supported by viability evidence.</li> </ul>	<p><u>Policy H5: Affordable Housing</u> CBC considers that Policy H5: Affordable Housing, as now drafted, is consistent with and supported by the Crawley Local Plan &amp; Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/01a).</p>

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Main Issues	How this was taken into account?
	Further justification for the Policy H5 approach to sites of 1-10 dwellings is set out in Topic Paper 3: Housing Needs (Submission Document Reference: DS/TP/03).
<ul style="list-style-type: none"> <li>Requiring self-build on larger sites in <b>Policy H7</b> is not justified– the council should allocate its own land to these – and the evidence of need (Self-build Register) is not considered sufficiently robust.</li> <li>Specific level of self-build requirement is queried.</li> </ul>	<p><u>Policy H7: Self and Custom Build</u> The relevance of the Self Build and Custom Housebuilding Register to the consideration of need for this type of housing is well established in legislation and national policy and guidance. Consideration of needs for different types of housing is set out more fully in Topic Paper 3: Housing Needs (Submission Document Reference: DS/TP/03). The proposed policy requirement for a proportion of self-build plots on suitable sites is considered to represent a justified and balanced approach.</p>
<ul style="list-style-type: none"> <li>Objection to suggestion of Gypsy and Traveller accommodation on safeguarded land in <b>Policy H8</b>.</li> </ul>	<p><u>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</u> The reference formally included within the text supporting Policy H8: Gypsy, Traveller and Travelling Showpeople Sites, to the proposal for an Area Action Plan within the Gatwick Airport Safeguarded area has now been removed (Submission Document Reference: CBLP/01).</p>
<p><b>Green Infrastructure &amp; Biodiversity</b> <i>Comments on this Chapter were received from 11 representors. These included local residents, landowners, developers and planning agents and specific interest groups: Sussex Ornithological Society, Environment Agency, Sussex Wildlife Trust, Home Builders’ Federation, The Ifield Society, Gladman Developments Ltd, Homes England, West Sussex County Council Property and Assets, Crawley Green Party and Natural England.</i></p> <p><i>Comments were received on Policies G11, G12, G13 and G14.</i></p>	
<ul style="list-style-type: none"> <li>Objection received in relation to <b>Policy G11: Green Infrastructure</b> to urban extensions being built as would remove biodiversity benefits on land. Highlighting danger to High Weald AONB and calling for higher densities and improving green infrastructure linkages.</li> <li>Support from the Environment Agency and Sussex Wildlife Trust to <b>Policy G11</b>.</li> </ul>	<p><u>Policy G11: Green Infrastructure</u> Support from the Environment Agency and Sussex Wildlife Trust to Policy G11: Green Infrastructure are noted.</p>
<ul style="list-style-type: none"> <li>Comments requesting the term soft landscaping be explained (previously in <b>Policy DD4: Tree and Landscape Character Planting</b>, now in <b>Policy G12: Biodiversity and Net Gain</b>).</li> </ul>	<p>Paragraph 14.31 within the Submission Local Plan (Submission Document Reference: CBLP/01) summarises what is included as part of soft landscaping and confirms that Policy DD1 (g) sets the general policy requirements for all new developments regarding landscaping.</p>
<ul style="list-style-type: none"> <li>Objection to the requirement of 10% net gain in Policy G12, as not yet legal, instead suggesting alternative wording to refer to “ensure net gain” rather than having percentage.</li> <li>Support for <b>Policy G12</b> from the Environment Agency and Sussex Wildlife Trust, with some additional suggestions made by the Wildlife Trust to the Policy.</li> </ul>	<p><u>Policy G12: Biodiversity and Net Gain</u> Support for Policy G12: Biodiversity and Net Gain (Submission Document Reference: CBLP/05) is noted.</p> <p>Paragraph 14.32 of the Submission Local Plan summarises the importance of protecting and improving the natural environment.</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Representations to <b>Policy G12</b>, suggesting protection for the land to the west of Crawley, including extension to Willoughby Local Nature Reserve to protect West of Ifield Rural Fringe and placing a Green Belt around Crawley’s administrative boundary.</li> </ul>	
<ul style="list-style-type: none"> <li>• Specific landowner requests for the removal of certain areas of Biodiversity Opportunity Areas under <b>Policy G13: Biodiversity Sites</b>.</li> <li>• Concerns in relation to <b>Policy G13</b> of the threat to ancient woodland, local wildlife and biodiversity in Ifield and near AONB from new development, and suggesting the creation of new Local Nature Reserve in Ifield and higher density housing throughout Crawley is required.</li> <li>• Support for <b>Policy G13</b> from the Environment Agency and Sussex Wildlife Trust welcome amendments made from the Regulation 18 version and the recognition of aligning to NPPF and promoting connectivity of green infrastructure.</li> </ul>	<p><u>Policy G13: Biodiversity Sites</u> Support is noted that concerns previously raised have been amended to align Policy G13: Biodiversity Sites with the NPPF.</p>
<ul style="list-style-type: none"> <li>• Representation from the landowner that <b>Policy G14: Local Green Space</b> should mention non inappropriate development that can pass “the test”.</li> <li>• Support from Sussex Wildlife Trust for <b>Policy G14</b> and recommend encouraging local communities to be consulted on Local Green Space to identify and protect current and future spaces.</li> </ul>	<p><u>Policy G14: Local Green Space</u> Policy G14 continues the designation for a Local Green Space. This follows the NPPF policy in relation to such designations. It continues the adopted Local Plan: Crawley 2030, December 2015, Policy ENV3 (Submission Document Reference: CBLP/02). The council does not agree with the need to include the proposed additional wording in relation to non-inappropriate development.</p> <p>Regulation 18 Consultation included engagement with communities to suggest other sites which they considered would meet the criteria for Local Green Space designation (Submission Document Reference: CBLP/06).</p>
<p><b>Sustainable Design &amp; Construction</b></p> <p><i>Comments on this Chapter were received from five representors. These included national government departments and agencies, utilities providers, landowners, developers and planning agents: Rainier Developments Ltd, Surrey County Council, Ardmere Ltd, Environment Agency, Southern Water and Natural England.</i></p> <p><i>Comments were received on Policies SDC1, SDC2 and SDC3.</i></p>	
<ul style="list-style-type: none"> <li>• <b>Policy SDC1: Sustainable Design &amp; Construction</b> should be more flexible and avoid adding additional burdens to development.</li> </ul>	<p><u>Policy SDC1: Sustainable Design &amp; Construction</u> The policy, as currently proposed, is considered to strike an appropriate balance between the need to ensure that development makes its contribution to climate change mitigation and the need to ensure that development remains viable.</p> <p>Further justification is set out in Topic Paper 6: Climate Change (Submission Document Reference: DS/TP/06).</p>

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Main Issues	How this was taken into account?
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<ul style="list-style-type: none"> <li>Support for stricter water efficiency requirements in <b>Policy SDC3: Tackling Water Stress</b>.</li> </ul>	<p><u>Policy SDC3: Tackling Water Stress</u> Support is noted.</p> <p>The policy approach has now evolved with Policy SDC3 retaining the approach of the adopted Local Plan: Crawley 2030, December 2015 (Submission Document Reference: CBLP/02), while Policy SDC4: Water Neutrality sets tighter on-side water efficiency requirements within the Sussex North Water Resource Zone, as part of the strategy for enabling development to come forward on a water neutral basis (Submission Document Reference: CBLP/01).</p>
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**Environmental Protection**

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

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

<ul style="list-style-type: none"> <li>Resident representation noting local flood issues.</li> <li>Support for flood risk approach, <b>Policy EP1: Development and Flood Risk</b>, from Thames Water (with addition of reference to sewer flooding) and EA.</li> <li>EA also support <b>Policy EP2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions</b> and <b>Policy EP3: Land Quality</b>.</li> <li>GAL supportive of <b>Policy EP4: Development and Noise</b> and no objection from Persimmon.</li> </ul>	<p>Support for approach to flood risk and pollution welcomed.</p>
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**Sustainable Transport**

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

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

<ul style="list-style-type: none"> <li>Requirements of <b>Policy ST1</b> for new development sites (in terms of use of sustainable transport) should be more specific.</li> <li>Greater potential for development supported by sustainable transport within currently safeguarded land.</li> <li>Objection on basis of absent Transport Assessment to support the Local Plan.</li> </ul>	<p><u>Policy ST1: Development and Requirements for Sustainable Transport</u> Policy ST1: Development and Requirements for Sustainable Transport sets out an approach which CBC considers to be justified, effective and consistent with the overall spatial strategy and design approach detailed elsewhere in the Local Plan.</p> <p>For compact places/increased residential densities to function reasonably, specific new sustainable movement infrastructure is required to supplement/in addition to highways for private cars.</p>
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## Initial Publication Consultation (Regulation 19): January – March 2020

Main Issues	How this was taken into account?
	<p>Section 4.45 and Policy CL4 of the 2020 draft Local Plan (Submission Document Reference: CBLP/05) and Chapter 4, principle 2 of the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01) explains the rationale and background guiding such infrastructure.</p> <p>The former proposal for an Area Action Plan to cover the Gatwick Airport Safeguarded land has now been removed.</p> <p>The Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a) was published as part of the 2021 Local Plan Regulation 19 consultation, and its update published in advance of the 2023 Local Plan Regulation 19 Consultation.</p>
<ul style="list-style-type: none"> <li>Requirements for electric vehicle charging points should not be included as it is getting ahead of national policy and is not justified by technical feasibility and demand evidence.</li> </ul>	<p><u>Policy ST2: Car and Cycle Parking Standards</u> It is anticipated that national standards for provision of EV charging infrastructure will be in place at the time of adoption of the Local Plan and that the requirements of Policy ST2: Car and Cycle Parking Standards will not exceed these.</p>
<ul style="list-style-type: none"> <li>Objections/concerns around <b>Policy ST4: Safeguarding of a Search Corridor for a Western Link Road</b> owing to environmental impact on local sites including biodiversity and heritage areas.</li> <li>Other views for and against western link road.</li> </ul>	<p><u>Policy ST4: Safeguarding of a Search Corridor for a Western Link Road</u> Policy ST4: Safeguarding of a Search Corridor for a Western Link Road (now referred to as Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link) includes a requirement for consideration of local biodiversity and any such road will be subject to other Local Plan policies in respect of biodiversity.</p>
<p><a href="#">Planning Obligations Annex</a> <i>Comments relating to viability, planning obligations and the Planning Obligations Annex were received from four representors: Sport England, Home Builders' Federation, Department of Education and Gladman Development Ltd.</i></p>	
<ul style="list-style-type: none"> <li>Specific comments/advice on approach to particular inputs for assessment of viability.</li> <li>Concern raised that Paragraph 2 in <b>Policy OS2: Provision of Open Space and Recreational Facilities</b> needs to be in accordance with paragraph 97 of NPPF.</li> <li>Highlighted the need to test cumulative impact of new policies, e.g. the effect of 10% net gain on development.</li> </ul>	<p>CBC considers that the costs imposed by the Planning Obligations Annex are adequately taken account of in the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/02a) and appendices and the Crawley Local Plan Viability Assessment Update, December 2022 (Submission Document Reference: DS/VA/01a).</p> <p>CBC considers that Policy OS2: Provision of Open Space and Recreational Facilities and the associated text within the Planning Obligations Annex are consistent with paragraph 99 of the 2021 NPPF (was paragraph 97 of the 2019 NPPF).</p>

Initial Publication Consultation (Regulation 19): January – March 2020	
Main Issues	How this was taken into account?
<p><b>Noise Annex</b>  Comments relating to the Noise Annex were received from two representors: Gatwick Airport Ltd and Homes England.</p>	
<ul style="list-style-type: none"> <li>Homes England questioned the noise contours used in the Noise Annex.</li> <li>GAL raised technical points on the Noise Annex.</li> </ul>	Comments on Noise Annex are noted. Topic Paper 7: Development and Noise Technical Appendix (Submission Document Reference: DS/TP/07) sets out the council's position.
<p><b>Housing Trajectory &amp; Strategic Housing Land Availability Assessment</b>  Comments relating to the Housing Trajectory were received from one representor: Reigate and Banstead Borough Council.</p> <p>Comments on the Strategic Housing Land Availability Assessment were received from two representors: local residents and NHS Property Services (NHSPS).</p>	
<ul style="list-style-type: none"> <li>Queries regarding the treatment of specific sites in relation to windfall allowance within Housing Trajectory.</li> <li>Representations on future development potential of Crawley Hospital.</li> </ul>	<p>The rationale of the proposed windfall allowance is set out in the Windfall Statement, May 2023 (Submission Document Reference: H/HN/06).</p> <p>The Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the methodology for assessing sites and individual site assessments.</p>
<p><b>Employment Land Trajectory</b>  Comments relating to the Employment Land Trajectory were received from one representor: Wilky Group.</p>	
<ul style="list-style-type: none"> <li>Wilky Group discussed its site and others in relation to the <b>Employment Land Trajectory</b>.</li> </ul>	Feedback is noted.
<p><b>Duty to Cooperate</b>  Comments relating to the Duty to Cooperate were received from seven representors: Arun District Council, Gladman Developments Ltd, local residents, Reigate and Banstead Borough Council, Mole Valley District Council, Home Builders' Federation and Danescroft (RLP Crawley) LLP.</p>	
<ul style="list-style-type: none"> <li>Home Builders Federation and Gladman Developments questioned whether any Statements of Common Ground had been prepared and agreed as part of the Local Plan Review.</li> <li>Local Authorities provided responses in relation to on-going joint working and unmet development needs and confirmed they did not consider they had any capacity to meet those needs within their administrative areas.</li> <li>A local resident raised concerns in relation to strategic development outside the borough's administrative boundaries.</li> </ul>	<p>The council's Duty to Cooperate Statement clearly shows the on-going nature of cross boundary working and discussions which have taken place since the adoption of the existing Local Plan: Crawley 2030, December 2015, and as part of the Local Plan Review (Submission Document Reference: KD/DtC/01). This has also been reported annually in the Local Plan Authority's Monitoring Reports (Submission Document References: CB/AMR/02 – CB/AMR/07).</p> <p>Statements of Common Ground have been published as they have been agreed, at various stages throughout the Local Plan Review process (Submission Document References: SoCG/01 – SoCG/16).</p> <p>Development outside the borough's administrative boundaries is outside of the control of Crawley Borough Council and the remit of the Local Plan. However, the council takes a positive and active role in discussions in relation to the Duty to Cooperate and as a Statutory Consultee in both the Local Plan and Development Management</p>

## Initial Publication Consultation (Regulation 19): January – March 2020

Main Issues	How this was taken into account?
	<p>processes of the adjoining Local Planning Authorities, within which the strategic developments are proposed. The policies within the Local Plan address the potential impacts as far as possible should strategic scale development come forward on, or close to, the borough's boundaries (including Policy GI4: Local Green Space and Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link). Local Plan evidence has sought, wherever possible, to include the potential impacts (such as the Crawley Transport Modelling Study, scenario 3, Submission Document Reference: ES/ST/01a, and the Crawley Western Link Road Study, Submission Document Reference: ES/ST/02, and the Open Space, Indoor Sports and Playing Pitch Strategy Studies, Submission Document References: WC/OSS/01 – WC/OSSR/04 and the Local Plan Infrastructure Plan, Submission Document Reference: KD/IP/01). Submission Local Plan paragraphs 12.17-12.23 (Submission Document Reference: CBLP/01) provide an appropriate statement of the council's approach to engagement with strategic development proposals 'at Crawley', following the removal of the 2020 draft Policy H3g (Submission Document Reference: CBLP/05).</p>
<p><b>Sustainability Appraisal/Strategic Environmental Assessment</b>  <i>Comments on the Sustainability Appraisal/Strategic Environmental Assessment were received from ten representors: Reigate &amp; Banstead Borough Council, Gladman Developments Ltd, Sussex Ornithological Society, HX Properties Ltd, Homes England, Historic England, Environment Agency, Sussex Wildlife Trust, Wilky Group and Natural England.</i></p>	
<ul style="list-style-type: none"> <li>• Need for clearer measures to enhance biodiversity.</li> <li>• Disagreement with/ objection to particular assessments/weightings, including on policies GAT2, EC3, EC4, EC6 and H1.</li> <li>• Questioning of why there is no test of higher threshold for affordable housing (Policy H5).</li> <li>• SEA representations re Gatwick Green.</li> <li>• Holiday Extras raise various points in relation to the consistency between the 2015 SA/SEA and the current SA/SEA. In particular that off-airport parking for objectives 1 and 2 is assessed as a 'double negative' when it was previously a single negative. The same argument is made in relation to the impact of off-airport parking on biodiversity.</li> <li>• Question on why higher densities are not encouraged instead of building urban extensions that effect biodiversity.</li> <li>• Highlight the need to ensure there is a sufficient evidence base upon which to plan to deliver net gain in biodiversity.</li> <li>• Natural England agree with the findings of the SA and SEA.</li> </ul>	<p>Comments on Sustainability Appraisal/Strategic Environmental Assessment (Submission Document Reference: KD/SA/01) are noted.</p> <p>The SA now includes consideration of options involving a higher percentage requirement for affordable housing policy (pages 259-265, Submission Document Reference: KD/SA/01).</p> <p>CBC disagreed with the notion that the proposed approach does not encourage higher densities. Policies CL2-CL5 require that major new development makes efficient use of land and encourages compact development by specifying suitable minimum density range threshold to applies across the borough's Built-Up Area. Following the 2020 Local Plan Regulation 19 Consultation, the rational, parameters and justification for compact development and higher density ranges and thresholds have been further explored in the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01) to support the submission Local Plan.</p> <p>Representations received against the SA/SEA have been published in its Appendix at each stage of</p>

## Initial Publication Consultation (Regulation 19): January – March 2020

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Wilky support conclusions of SA/SEA with regard to the AAP policy but consider that the negative impact cited for “Conserve /enhance Biodiversity and Landscape” should instead be neutral or positive because of the requirement for bio-diversity net gain and mitigation/compensation.</li> </ul>	<p>public consultation (Submission Document References: KD/SA/02, Appendix B and C, and KD/SA/03, Appendix B, C and D).</p> <p>The council has revisited the SA/SEA and updated and amended it where considered appropriate (Submission Document Reference: KD/SA/01).</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p>
<p><b>Local Plan Map</b>  <i>Comments on the Local Plan Map were received from one representor: Aggregate Industries UK Ltd, Cemex UK Operations Ltd, Day Group Ltd and Brett Group.</i></p>	
<ul style="list-style-type: none"> <li>Support for the 250m buffer surrounding the safeguarded railhead site shown on the Local Plan Map.</li> </ul>	<p>Support is noted.</p>
<p><b>Infrastructure Plan</b>  <i>Comments on the Infrastructure Plan were received from two representors: West Sussex County Council and Homes England.</i></p>	
<ul style="list-style-type: none"> <li>Factual points.</li> <li>Request for clearer reference to ‘intent to support upgrades of the busway in accordance with expected growth’ under ‘Studies and Plans’ for Bus travel.</li> </ul>	<p>The Infrastructure Plan, July 2023 (Submission Document Reference: KD/IP/01) reflects successive stages of input from consultees and stakeholders.</p> <p>It is considered to be up-to-date in its discussion of bus provision.</p>
<p><b>Habitats Regulations Assessment</b>  <i>Comments on the Habitats Regulations Assessment Screening Report were received from four representors: Sussex Ornithological Society, Reigate &amp; Banstead Borough Council, Mid Sussex District Council and Natural England.</i></p>	
<ul style="list-style-type: none"> <li>Natural England agree with the findings of the HRA Screening Report.</li> <li>Reigate and Banstead Borough Council and Mid Sussex District Council provided some additional information regarding HRA in combination and work undertaken for their own Development Plan Documents.</li> <li>Sussex Ornithological Society note the intention to carry out “in combination” assessments of impacts on European designated sites outside the Borough Boundaries, to reflect increased levels of development and resulting increased levels of traffic.</li> </ul>	<p>The Habitats Regulations Assessment Report, January 2023 (Submission Document Reference: KD/HRA/01) provides a table summarising the representations received at each stage of public consultation and how these have been addressed (Table 3.2, pages 22-25).</p> <p>A report relating to the work undertaken in relation to the Habitats Regulations was published at every stage of Local Plan formal consultation (Regulation 18 and each of the three Regulation 19 consultations). This included the scoping and screening reports prepared in-house (Submission Document References: KD/HRA/03 and KD/HRA/04). When feedback from emerging evidence indicated there was a need for an Appropriate Assessment to be carried out, this was undertaken and published in draft (Submission Document Reference: KD/HRA/02) prior to the final report, January 2023, being published alongside the Submission Local Plan consideration through the committee cycle to Full Council in February 2023 and for Publication Regulation 19 Consultation in</p>

**Initial Publication Consultation (Regulation 19): January – March 2020**

<b>Main Issues</b>	<b>How this was taken into account?</b>
	<p>May 2023 (Submission Document Reference: KD/HRA/01).</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p>

### 3. Additional Publication Consultation (Regulation 19): January – June 2021

<b>Additional Publication Consultation (Regulation 19): January – June 2021</b>	
<b>Main Issues</b>	<b>How this was taken into account?</b>
<p><b>Local Plan General &amp; Vision</b></p> <p><i>General comments on the Local Plan and its vision were received from 13 representors. These included local residents, local authorities, national government agencies, developers and specific interest groups: Crawley Town Centre Bid Board, Highways England, Turley on behalf of A2 Dominion, Squires Planning, Barton Wilmore on behalf of The Sogno Family, West Sussex County Council, Gladman Developments, Rusper Council, SMB Town Planning Limited, and LRM Planning on behalf of WT Lamb Properties, Staminier Group and Elliot Metals/The Simmonds Family.</i></p> <p><i>Comments were received on the strategic approach to housing, economy and the environment.</i></p>	
<ul style="list-style-type: none"> <li>• WSCC commented that the transport evidence base required (at the time) further work and offered its assistance to address the soundness of the Plan.</li> <li>• General comments on housing, town centre, and supporting infrastructure.</li> <li>• General concerns were raised that some evidence base, including viability and transport work, had not been completed at the time of Regulation 19 consultation.</li> <li>• Concern expressed relating to the proposed allocation of a strategic employment location at Gatwick Green.</li> <li>• Support for the <b>Local Plan Vision</b>, particularly in relation to economic growth.</li> <li>• Some representation questioned the legal compliance of the Local Plan.</li> </ul>	<p>All of the evidence supporting the Local Plan formed part of the iterative development of the Local Plan. The emerging information was prepared alongside, and fed into, the Local Plan's preparation and decisions on policy drafting, requirements and site allocations. The decisions were then reflected in the final published evidence.</p> <p>The Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a) was published as part of the 2021 Local Plan Regulation 19 consultation, with six weeks following its publication to allow for representations to include consideration of the evidence. Its update was published as soon as it was finalised (June 2022) in advance of the 2023 Local Plan Regulation 19 Consultation.</p> <p>The Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/02a) and appendices was also published as part of the 2021 Local Plan Regulation 19 Consultation, allowing three months for representations to consider this evidence before the close of consultation at the end of June 2021. The Crawley Local Plan Viability Assessment Update, December 2022 (Submission Document Reference: DS/VA/01a) was published in January 2023, in advance of the 2023 Regulation 19 consultation, as part of the committee reporting cycle ahead of the Full Council held in February 2023.</p>
<p><b>Sustainable Development</b></p> <p><i>Comments on this Chapter were received from six representors. These included those from neighbouring local authorities, national government agencies, landowners and planning agents and specific interest groups: Woodland Trust, Natural England, Pegasus Group, Sussex Wildlife Trust, Ardmore/ Windsor Land Consortium, Mid Sussex District Council.</i></p> <p><i>Comments were received in relation to Policies SD1 and SD2, as well as the removed SD3.</i></p>	
<ul style="list-style-type: none"> <li>• Concern was raised by planning agents on behalf of landowners in relation to the list of criteria set out in <b>Policy SD1: Sustainable Development</b>.</li> </ul>	<p><b>Policy SD1: Sustainable Development</b></p> <p>Policy SD1 is a Strategic overarching policy, it reflects the national presumption in favour of sustainable development along with the strategic issues and context of Sustainable Development</p>

## Additional Publication Consultation (Regulation 19): January – June 2021

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Support was received for criteria, carbon neutral, climate change adaptation and green infrastructure and ancient woodland, set out in <b>Policy SD1</b>.</li> <li>Recommendations were made to strengthen reference to other aspects of sustainable development, natural resource use and minimising pollution, in <b>Policy SD1</b>.</li> </ul>	<p>within Crawley borough. This policy has been retained from the adopted Local Plan: Crawley 2030, December 2015 (Submission Document Reference: CBLP/02).</p>
<ul style="list-style-type: none"> <li>Representations were received from property developers linking health in <b>Policy SD2: Health and Wellbeing</b> with housing development.</li> <li>Support was received for the inclusion of reference to open space in relation to <b>Policy SD2</b>.</li> </ul>	<p><u>Policy SD2: Health and Wellbeing</u> Support for Policy SD2 is noted.</p>
<ul style="list-style-type: none"> <li>Disappointment was expressed in relation to the deletion of <b>Policy SD3: North Crawley Area Action Plan</b>. Some inconsistency remaining throughout the Plan was highlighted.</li> </ul>	<p><u>Removal of Policy SD3: North Crawley Area Action Plan</u> The council's approach regarding removal of Policy SD3 is set out through Topic Paper 2: Gatwick Airport, section 3.4 (Submission Document Reference: DS/TP/02).  Text throughout the Local Plan has been amended to reflect deletion of this policy.</p>
<p><b>Character, Landscape &amp; Development Form</b> <i>Comments on this Chapter were received from 12 representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: Ardmore/Windsor Land Consortium, Mid Sussex District Council, St. Catherine's Hospice, Crawley Town Centre Bid Board, Danescroft (RLP Crawley) LLP, Horsham District Council, WSCC Property and Assets, Sussex Wildlife Trust, The Wilky Group, Aberdeen Standard Investments, Ifield Village Conservation Area Advisory Committee, and Natural England.</i></p> <p><i>Comments were received on Policies CL1, CL2, CL3, CL4, CL5, CL6, CL7, CL8 and CL9.</i></p>	
<ul style="list-style-type: none"> <li>Representations were received supporting the neighbourhood principle in <b>Policy CL1: Neighbourhood Principle</b>.</li> <li>Suggestions were received to secure higher density close to transport corridors.</li> <li>Representations were received from land promoters highlighting how their scheme addresses the criteria set out in <b>Policy CL2: Principles of Good Urban Design</b>.</li> <li>Support was received for the higher densities set out in <b>Policy CL4: Compact Development</b> and the maximisation of housing delivery within the borough.</li> </ul>	<p><u>Policies CL1, CL2 and CL4</u> Support is noted.</p>
<ul style="list-style-type: none"> <li>Support was received for the higher densities close to sustainable transport hubs in <b>Policy CL4</b>, but concern was raised that the walking distance was too short and flexibility of application was requested.</li> <li>Representations were received suggesting <b>Policy CL4</b> should only allow developments below the minimum density of 45dpa in exceptional circumstances and be supported by evidence.</li> </ul>	<p><u>Policy CL4: Compact Development</u> The National Model Design Guide outlines the rationale behind maximum walking distances and density ranges. The Guide itself is based upon a comprehensive evidence base, including Transport for London's 'Public Transport Accessibility Levels' (PTALs) and the Urban Design Compendium's walkable neighbourhood's chapter; 3.2.1 the neighbourhood unit.</p>

## Additional Publication Consultation (Regulation 19): January – June 2021

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Objections were received from a planning agent on behalf of a developer to <b>Policy CL4</b>.</li> <li>• Greater evidence in the form of the <b>Densification Study</b> was requested to confirm CBC has done all it can to meet as much of its housing need within the borough as possible.</li> </ul>	<p>For new compact places/higher residential densities to function well and be acceptable to existing communities, specific public transport infrastructure needs to be located within evidence based maximum walking distances, as outlined in paragraphs 4.31 - 4.34 and Policy CL3 of the 2021 Local Plan (Submission Document Reference: CBLP/01).</p> <p>In response to the representations, the underpinning evidence and how it applies to Crawley, has been considered in detail as part of the Compact Residential Development Study, May 2023, see Chapter 4, principle 2 (Submission Document Reference: WC/CLD/01).</p> <p>The Submission Crawley Borough Local Plan Strategic Policy CL2: Making Successful Places – Principles of Good Urban Design (Submission Document Reference: CBLP/01) requires that all new development must identify, test, determine and (where appropriate) embrace increased density. Policy CL4 (now known as Policy CL4: Compact Development – Layout, Scale and Appearance) identifies two compact development categories as suitable for specifically listed geographical locations within the town, where new proposals must achieve minimum higher density ranges unless existing character justifies a lower figure in a given context. A minimum low density figure also applies to all new development across all parts of the town (within the Built-Up Area Boundary).</p> <p>Following the 2021 Local Plan Regulation 19 Consultation, the Compact Residential Development Study, May 2023 was updated so that it provided the rationale and guidance to justify and enable the requirements associated with higher density ranges to be understood and applied on a site-specific basis (Submission Document Reference WC/CLD/01), see Chapter 4, principles 1-4 and 6. However, outside of the two categories of borough locations noted previously as suitable for higher density development, the capacity of the town to accommodate further housing is limited without very good design, planning and careful consideration. Chapter 5, paragraph 5.10 and 5.19 - 5.20, notes that that even retrofitting a new 'gentle density' form of development within typical lower density existing urban settings, is not easy and that existing character assessment and specific standard public transport infrastructure must underpin compact development ambitions.</p> <p>To further aid the council identify as many new housing opportunities within the borough as possible during the Local Plan period, Chapter 6 of the Compact Residential Development Study, May</p>

## Additional Publication Consultation (Regulation 19): January – June 2021

Main Issues	How this was taken into account?
	<p>2023 (Submission Document Reference WC/CLD/01) reassessed the potential for increased units by reviewing the density range assumptions outlined in the earlier Strategic Housing Land Availability Assessment (SHLAA), January 2020 (Submission Document Reference: H/HD/05).</p> <p>Desktop assessments were carried out for each site listed within the five SHLAA categories where major allocations were expected to be deliverable during the Local Plan period (Submission Document Reference: H/HD/04).</p>
<ul style="list-style-type: none"> <li>• Suggestion from the landowner to remove the designation of <b>Policy CL6: Structural Landscaping</b> to some areas – this was a repeated representation from the previous Regulation 19 consultation carried out in 2020.</li> <li>• Representation was received requesting <b>Structural Landscaping</b> be included on the <b>Local Plan Map</b>.</li> </ul>	<p><u>Policy CL6: Structural Landscaping</u> Areas of trees and soft landscape that make an important contribution to the development, character and appearance of the borough are identified as part of the adopted Local Plan: Crawley 2023, December 2015 (Submission Document Reference: CBLP/02).</p> <p>The background and justification for this Policy is outlined in the 2021 Strategic Policy DD1 (g) and paragraphs 5.6-5.7, 5.10 and 5.13-5.14, as well as in Chapter 4, Policy CL6 and Strategic Policy CL2, and paragraphs 4.4, 4.9-4.11, 4.17, 4.23-4.24 and 4.27-4.28 and 4.29 (1) (Submission Document Reference: CBLP/01).</p>
<ul style="list-style-type: none"> <li>• Representations were received from the planning agents on behalf of land promoters in relation to their proposed schemes and <b>Policy CL7: Important and Valued Views</b>.</li> </ul>	<p><u>Policy CL7: Important and Valued Views</u> The Important and Valued Views designation has been retained from the existing adopted Local Plan: Crawley 2030, December 2015, Policy CH8 (Submission Document Reference: CBLP/02) which was found sound through the previous Local Plan Examination (Submission Document Reference: CBLP/03).</p> <p>The protection of existing character is considered essential. This is covered within the Compact Residential Development Study, Chapter 4 (Submission Document Reference: WC/CLD/01) Existing Character Assessment is addressed in Policy CL2.</p>
<ul style="list-style-type: none"> <li>• Representations were received suggesting amendments to the Built Up Area Boundary and promoting land outside the Built Up Area Boundary, as an extension to Manor Royal for employment use from planning agents on behalf of land promoters (<b>Policy CL8: Development Outside the Built-Up Area Boundary</b>).</li> <li>• Support was received for the West of Ifield Rural Fringe sensitive countryside character area in <b>Policy CL8</b>.</li> <li>• Concern was raised in relation to the conflict between the acknowledgment of the role of the Upper Mole Farmlands Rural Fringe in <b>Policy</b></li> </ul>	<p><u>Policy CL8, Development Outside the Built-Up Area Boundary</u> Support is noted.</p> <p>Paragraph 4.70 of the Submission Local Plan has since been inserted into the Reasoned Justification to this policy to address the concerns raised in relation to development outside the Built-Up Area boundary as urban extensions.</p> <p>The protection of existing character is considered essential. This is covered within the Compact Residential Development Study, Chapter 4 (Submission Document Reference: WC/CLD/01) Existing Character Assessment is addressed in Policy CL2.</p>

**Additional Publication Consultation (Regulation 19): January – June 2021**

Main Issues	How this was taken into account?
<p><b>CL8</b> and the proposed Area of Search for the Crawley Western Link Road (<b>Policy ST4</b>).</p> <ul style="list-style-type: none"> <li>• Objections were received from the landowners to their site's partial location outside the Built-Up Area Boundary.</li> </ul>	
<ul style="list-style-type: none"> <li>• Support was received from Natural England to <b>Policy CL9: High Weald Area of Outstanding Natural Beauty</b>.</li> </ul>	<p><u>Policy CL9, High Weald Area of Outstanding Natural Beauty</u> Support is noted.</p>
<p><b>Design &amp; Development Requirements</b></p> <p><i>Comments on this Chapter were received from 10 representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: Horsham District Council, Sussex Wildlife Trust, Woodland Trust, Aberdeen Standard Investments, Natural England, The Planning Bureau Ltd, Inspired Villages, Gladman Developments, Home Builders Federation and Gatwick Airport.</i></p> <p><i>Comments were received on Policies DD1, DD2, DD3, DD4, DD5, DD6 and DD7.</i></p>	
<ul style="list-style-type: none"> <li>• Support was received for <b>Policy DD1: Normal Requirements of All New Development</b>, including reference to Biodiversity Net Gain and protection of trees.</li> <li>• Suggestion was made for strengthening reference to tree canopies in <b>Policy DD1</b>.</li> <li>• Concerns were raised in relation to criteria set out in <b>Policy DD1</b>, including protection of trees.</li> <li>• Concern was raised to the number of standards, and the thresholds for these, the draft Local Plan requires.</li> </ul>	<p><u>Policy DD1: Normal Requirements of All New Development</u> Support is noted.</p> <p>The background and justification for this Policy is outlined in the 2021 Strategic Policy DD1 (g) and paragraphs 5.6-5.7, 5.10 and 5.13-5.14, as well as in Chapter 4, Policy CL6 and Strategic Policy CL2, and paragraphs 4.4, 4.9-4.11, 4.17, 4.23-4.24 and 4.27-4.28 and 4.29 (1) (Submission Document Reference: CBLP/01).</p>
<ul style="list-style-type: none"> <li>• Concerns were raised regarding the requirements of <b>Policy DD2: Inclusive Design</b> and request the council justify its position.</li> </ul>	<p><u>Policy DD2: Inclusive Design:</u> Policy DD2 requires that all new dwellings must be capable of adapting to the changing needs of residents in line with national Building Regulations Part M Category 2. This requirement is established in the adopted Local Plan: Crawley 2030, December 2015 (Submission Document Reference: CBLP/02). It has been separated out into a distinct Policy in the Submission Local Plan for clarity. The Submission Policy also extends the requirement from residential development to all new development.</p> <p>The Submission Local Plan Policy (Submission Document Reference: CBLP/01) introduces flexibility in exceptional circumstances, which is not explicitly allowed for in the adopted Policy.</p> <p>Other inclusive features, beyond those set out in the Building Regulations, are strongly recommended. Justification is outlined in paragraphs 5.19-5.22 (Submission Document Reference: CBLP/01).</p>
<ul style="list-style-type: none"> <li>• Objections were received to <b>Policy DD3: Standards for All New Dwellings (including conversions)</b> suggesting that it is too prescriptive.</li> </ul>	<p><u>Policy DD3: Standards for All New Dwellings (including conversions):</u> Policy DD3 and paragraphs 5.25-5.26 summarises the national policy justification and context for these standards. Further guidance is provided both within</p>

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Main Issues	How this was taken into account?
	the policy and supporting text and in the Urban Design SPD.
<ul style="list-style-type: none"> <li>Support was received for <b>Policy DD4: Tree Replacement Standards</b>.</li> <li>Concerns were raised against <b>Policy DD4</b> both in that the compensation for replacement trees does not go far enough and the financial compensation for replacement trees is considered unviable.</li> </ul>	<p><u>Policy DD4: Tree Replacement Standards</u>. Support is noted.</p> <p>The background and justification for this Policy is outlined in the 2021 Strategic Policy DD1 (g) and paragraphs 5.6-5.7, 5.10 and 5.13-5.14, as well as in Chapter 4, Policy CL6 and Strategic Policy CL2, and paragraphs 4.4, 4.9-4.11, 4.17, 4.23-4.24 and 4.27-4.28 and 4.29 (1) (Submission Document Reference: CBLP/01).</p>
<ul style="list-style-type: none"> <li>Gatwick Airport Limited (GAL) outlined support for the inclusion of a dedicated policy relating to aerodrome safeguarding: <b>Policy DD5: Aerodrome Safeguarding</b>. GAL has since advised of regulatory changes requiring that Local Plans refer to airport Public Safety Zones. Amendments made to the policy and supporting text respond to this request.</li> </ul>	<p><u>Policy DD5: Aerodrome Safeguarding</u> Support welcomed.</p> <p>Text amendments have been made to Policy DD5 to reflect Gatwick Airport Limited feedback (Submission Document Reference: CBLP/01).</p>
<ul style="list-style-type: none"> <li>GAL support <b>Policy DD6: Advertisements</b>.</li> </ul>	<p><u>Policy DD6: Advertisements</u> Support welcomed.</p>
<ul style="list-style-type: none"> <li>Sussex Wildlife Trust question whether <b>Policy DD7: Crossovers</b> should acknowledge biodiversity and/or flooding benefits to the grass verges.</li> </ul>	<p><u>Policy DD7: Crossovers</u> The Local Plan should be read as a whole and Policies DD1, GI1, GI3 and EP1/EP2 apply.</p>
<p><b>Heritage</b></p> <p><i>Comments on this Chapter were received from three representors. These included a neighbouring parish council, a planning agent representing a landowner and a specific interest group: Ifield Village Conservation Area Advisory Committee, The Wilky Group, Rusper Parish Council.</i></p> <p><i>Comments were received on Policies HA1, HA2, HA3, HA4, HA5, HA6, HA7 and HA8.</i></p>	
<ul style="list-style-type: none"> <li>Support received for the various designations included – particularly within Ifield – as well as the Local Green space designation.</li> <li>Request that Village Greens be added to list of Heritage Assets <b>Policy HA1: Heritage Assets</b> and that reference is made in the policies to Ifield Village Green.</li> <li>Representations agree that the approach set out in <b>Policy HA1: Heritage Assets</b> and <b>Policy HA5: Locally Listed Buildings</b> is consistent with national planning policy and guidance.</li> </ul>	<p><u>Policy HA1: Heritage Assets</u> CBC consider that Ifield Village Green has appropriate recognition as a heritage asset, as an important feature of Ifield Village Conservation Area, which is recognised in the relevant Conservation Area Statement.</p>
<ul style="list-style-type: none"> <li>Recommendation that there is greater emphasis in <b>Policy HA2: Conservation Areas</b> on the potential for new development and increased densities to have a positive impact on the character and setting of existing Conservation Areas.</li> </ul>	<p><u>Policy HA2: Conservation Areas</u> CBC does not consider that amendment of Policy HA2: Conservation Areas to express ‘in principle’ support for higher density development was appropriate, given the role of the Policy. Policy CL2 requires that all new development must identify, test, determine and (where appropriate) embrace increased density and paragraph 4.57 notes that new development density, massing, appearance or unit typology does not have to be the same as the</p>

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Main Issues	How this was taken into account?
	<p>surrounding area (Submission Document Reference: CBLP/01).</p> <p>This is further considered in the supporting Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01) Chapters 1 and 2.</p>
<ul style="list-style-type: none"> <li>Proximity of some actual or potential heritage assets to the proposed Gatwick Green Strategic Employment Location (SEL) is noted and impacts on these will need to be considered as part of the SEL proposal.</li> <li>The suggestion was received that Rusper Road should be included on the local heritage list.</li> </ul>	<p><u>Policy HA3: Areas of Special Local Character</u> Policy HA3: Areas of Special Local Character identifies an Area of Special Character at Rusper Road.</p> <p>Impacts on heritage assets close to the Strategic Employment allocation will need to be assessed as part of determining any proposal.</p>
<p><b>Open Space, Sport &amp; Recreation</b></p> <p><i>Comments on this Chapter were received from three representors. These included the County Council, a national government agency and a specific interest group: Woodland Trust, West Sussex County Council and Natural England.</i></p> <p><i>Comments were received on Policies OS2 and OS3.</i></p>	
<ul style="list-style-type: none"> <li>Support received for <b>Policy OS2: Provision of Open Space and Recreational Facilities</b>, in particular the use of Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.</li> </ul>	<p><u>Policy OS2: Provision of Open Space and Recreational Facilities</u> Support is noted for the inclusion of Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.</p>
<ul style="list-style-type: none"> <li>Support for the recognition of Public Rights of Way by Crawley Local Plan in <b>Policy OS3</b>.</li> <li>Concern was raised that <b>Policy OS3: Public Rights of Way and Access to the Countryside</b> was not in keeping with the NPPF of requiring PRoW to be protected and enhanced. The representation was also concerned that the Policy was negatively worded in assuming that all development will always adversely affect the network. They noted that they would like to see more of an emphasis on the positive net gains that can be achieved through development.</li> <li>Support for the inclusion of <b>Policy OS3</b>, but concern raised that the constraints of Public Rights of Way had not been recognised in relation to some of the site allocations.</li> </ul>	<p><u>Policy OS3: Rights of way and access to the countryside</u> Support for the recognition of Public Rights of Way is noted.</p> <p>Concern raised with the Policy has been addressed by new wording added to emphasis the positive gains that can be achieved.</p> <p>Support is noted for the confirmation within the policy of when a Public Rights of Way should be enhanced and improved.</p> <p>The Submission Local Plan includes a map that identifies the Greenway, Public Rights of Way and the Crawley cycle network (Submission Document Reference: CBLP/01). This policy will apply to any site allocations as Local Plan compliant schemes.</p>
<p><b>Infrastructure Provision</b></p> <p><i>Comments on this Chapter were received from three representors. These included the county council, a landowner and planning agent, and a business: West Sussex County Council, The Wilky Group and Gatwick Airport Limited.</i></p> <p><i>Comments were received on Policies IN1 and IN2 (support).</i></p>	
<ul style="list-style-type: none"> <li>Amendment to <b>Policy IN1: Infrastructure Provision</b> was recommended to clarify that replacement/alternative infrastructure facilities compensating for loss may be located outside the borough boundary.</li> </ul>	<p><u>Policy IN1: Infrastructure Provision</u> CBC considers that the Policy is drafted sufficiently flexibly to allow for replacement to be delivered</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Representations considered <b>Policy IN1</b> to be sound but recommendations were made for modification to the reasoned justification in order to allow for different approaches to delivery of Infrastructure.</li> <li>Support for <b>Policies IN1 and IN2: The Location and Provision of New Infrastructure</b> was reiterated by Gatwick Airport Limited.</li> <li>Support was expressed for the wording of <b>Policy IN1: Infrastructure Provision</b> on the basis that it is worded flexibly so as to leave open potential for S106 contributions to be secured towards Education where appropriate, even if contributions towards meeting cumulative demand arising from small and medium-sized developments (such as are expected to be the norm in Crawley) are more likely to come in the form of CIL. Requests that clarification to this effect is included as part of the viability evidence.</li> </ul>	<p>outside the administrative boundary of the borough, where suitable.</p> <p>Expressions of support are noted.</p> <p>Subsequent revisions to the Reasoned Justification of Policy IN1 (reflected in the Submission Local Plan – Submission Document Reference: CBLP/01) together with changes to the Reasoned Justification wording and Infrastructure Plan text suggested in Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) pages 6-7, are considered to address comments regarding the approaches to the delivery of infrastructure.</p>
<ul style="list-style-type: none"> <li>Support was expressed for <b>Policy IN3: Supporting High Quality Communications</b>, though noted that its gigabit ambitions have moved on since the consultation draft, suggesting amendments to supporting text that more accurately reflect the current position.</li> </ul>	<p><u>Policy IN3: Supporting High Quality Communications</u> Support is noted.</p> <p>Amendments made as suggested to the Local Plan text to reflect feedback received from West Sussex County Council.</p>
<p><b>Economic Growth</b></p> <p><i>Comments on this Chapter were received from 41 representors. These included local residents, neighbouring local authorities and the county council, landowners and planning agents, businesses and specific interest groups: Ardmere/Windsor Land Consortium, WT Lamb Properties, Staminier Group and Elliot Metals/The Simmonds Family, Horsham District Council, The Wilky Group, Gatwick Airport Limited, COIF Nominees Ltd, Aldi Stores Ltd., Aberdeen Standard Investments, West Sussex County Council, Reigate and Banstead Borough Council, Mid Sussex District Council, 22 local residents, Fernhill Riding School, CMA Planning Ltd., Radford Road Community Ltd., a landowner, Horley Town Council, Vectos, HX Properties Ltd. and Crawley Town Centre Bid Board.</i></p> <p><i>Comments were received on Chapter 9 generally as well as specific Policies EC1, EC2, EC3, EC4, EC5, EC7, EC8, EC9, EC10 and EC11.</i></p>	
<ul style="list-style-type: none"> <li>Various objections have been received to the allocation of the Gatwick Green Strategic Employment site, relating to <b>Policy EC1: Sustainable Economic Growth</b> and <b>Policy EC4: Strategic Employment Location</b>. These include: <ul style="list-style-type: none"> <li>A number of residents and landowners living close to the site have set out objections. Issued raised include strong concern about the principle and scale of a Strategic Employment Location in a countryside location. Strong concerns relating to impacts on amenity were expressed, and it was questioned how effective any landscape buffering would be. Objections also cited impacts about</li> </ul> </li> </ul>	<p><u>Policy EC1: Sustainable Economic Growth &amp; Policy EC4: Strategic Employment Location</u></p> <p>The concerns raised by residents living close to the site are noted. Policy EC4 text has been strengthened to emphasise the need for careful master planning, layout and landscaping to ensure that impacts on residential amenity are appropriately mitigated. All comments have been fed back to the site promoter to take account of.</p> <p>Support for allocation of a Strategic Employment Location is noted.</p> <p><i>Re: Critiques of employment figures set out in the Local Plan.</i></p> <p>The council's approach to identification of economic need is discussed in detail in Topic Paper 5:</p>

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<p>the scale of new buildings, vehicular movements, flooding, visual intrusion, impact on biodiversity. Representations questioned the need for a Strategic Employment Location. Impact on property values was a strong and consistent message, with a significant number of respondents requesting compensation or the purchase of their properties by the developer.</p> <ul style="list-style-type: none"> <li>○ Gatwick Airport Limited objected to the proposed allocation, principally on grounds that the land should remain safeguarded for a future runway, in line with national policy, as the land is required for airport parking. GAL also argue the site is larger than needed, as the economic impacts of Covid-19 are not fully taken account of, and suggest that a continuation of past trends overstates the need – to this end GAL considers that a further review of employment growth findings may be required. To this end, GAL questions why a smaller release of land, less likely to impact on safeguarding, has not been considered. More broadly, GAL argues that any employment need should be met elsewhere in the borough or in nearby authority areas. GAL also raise concerns about traffic growth, including whether Gatwick’s passenger growth on its existing runway has been taken into account.</li> <li>○ RBBC, Horley Town Council, and MSDC have outlined concern relating to traffic access and generation. RBBC advised that the recommended “left turn in and right turn out bans for HGV’s at Gatwick Green’s access/egress junctions” text from the Transport Study should be included in the policy.</li> <li>○ RBBC objected to the inclusion of the word “minimum” in front of the site area 24.1ha that is allocated for B8 (with some B2 if needed), considering this to allows for too much uncertainty within the site allocation. Consider it should be removed and potentially replace by “up to”.</li> <li>● Wilky Group are the Gatwick Green Strategic Employment Location promoters and welcome the allocation. Other site promoters have raised objections to the allocation, favouring instead (or in addition to) sites they are promoting. Vail</li> </ul>	<p>Employment Needs and Land Supply (Submission Document Reference: DS/TP/05).</p> <p>Section 4 summarises evidence from the Northern West Sussex Economic Growth Assessment 2020 (Submission Document Reference: EGSM/EG/07) and its Crawley focused updates 2020 (Submission Document Reference: EGSM/EG/06) and 2023 (Submission Document Reference: EGSM/EG/05).</p> <p>Following the Local Plan Additional Regulation 19 consultation, held in 2021, a new section 5 was added to Topic Paper 5, picking up on market evidence/signals relating to strategic industrial/logistics development.</p> <p><i>Approach to Safeguarding:</i> The approach regarding safeguarding is discussed in detail in Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02). Section 2.2 summarises the national policy context for safeguarding for a potential future southern runway at Gatwick.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan evolved following the Initial Regulation 19 Consultation.</p> <p><i>Traffic and Transport Study</i> Additional text added to Policy EC4, as per Transport Study (Submission Document Reference: ES/ST/01a), to address points regarding traffic access and generation.</p> <p><i>Site Allocation Size</i> The suggested change that the word ‘minimum’ is removed from Policy EC4 has not been taken forward. The policy is clear that growth beyond the identified 24.1ha need (as required in Submission Document Reference: CBLP/04) will only be supported where justified by evidence, having regard to impact on other areas.</p>

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<b>Main Issues</b>	<b>How this was taken into account?</b>
<p>Williams, on behalf of Ardmere/ Windsor Land Consortium, considers its site to represent a natural extension to Manor Royal and therefore a more sustainable location. It also argues that safeguarding should be lifted, enabling its site to come forward. LRM Planning on behalf of WT Lamb Properties, Staminier Group and Elliott Metals/The Simmonds Family support the Strategic employment Location allocation but consider a larger site, including their own land, is needed.</p> <ul style="list-style-type: none"> <li>Support was received for the approach set out in <b>Policy EC1</b>, noting that the focus of new land allocations is to provide industrial units at Gatwick Green, with mixed business growth at Manor Royal and at existing employment sites. Horsham District Council considered this complementary to its employment strategy which supports smaller business spaces and start-ups.</li> </ul>	
<ul style="list-style-type: none"> <li>The approach of <b>Policy EC2: Economic Growth in Main Employment Areas</b> was supported.</li> <li>Concern was expressed that part of a site appeared to be removed from the Manor Royal Main Employment Area – this latter point relates to a mapping error that has since been addressed.</li> <li>It was suggested that the <b>Policy EC2</b> loss of employment criteria should not apply to town centre locations.</li> <li>Representations were received which did not consider <b>Policy EC2</b> to be sufficiently supportive of retail foodstores.</li> </ul>	<p><u>Policy EC2: Economic Growth in Main Employment Areas</u> Concern regarding the identified mapping error has been addressed.</p> <p>Disagree with comments raised regarding loss of employment criteria in town centre. The NPPF recognises the role of town centres for a range of activities including commercial, community and residential uses. Crawley Town Centre is a main employment area, albeit one where there is scope for employment and residential uses to co-exist.</p> <p>Policy EC2 seeks to deliver a balanced approach between employment and residential uses within the Town Centre to retain its vitality and viability. Application of the EC2 loss of employment tests does not restrict the scope for upper floor changes of use to residential or community uses, as applications for residential or community use that meet the requirements can be permitted. Development satisfying EC2 the loss of employment criteria can be permitted. The test is needed to ensure that residential is appropriately located and that the balance/location of commercial/ community/residential uses is appropriate to support long-term Town Centre vitality and viability.</p> <p>Disagree with criticism of Policy EC2 regarding retail food stores. Retail is considered an employment use, though it is also a Main Town Centre use, and applications for retail will be considered having regard to the relevant policies as appropriate. Applications for retail that are not in the Town Centre would need to meet the sequential and as required impact tests. Movement within Class E is outside of the scope of the Local Plan.</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Support was received to the amendment to <b>Policy EC7: Hotel and Visitor Accommodation</b> which recognises the airport, like the Town Centre, as a sustainable location for hotels and excludes it from the sequential test.</li> <li>Conversely, objections were also received to this change to <b>Policy EC7</b>, arguing it is against national policy and that the primary objective should be the vitality and viability of the town centre.</li> <li>Representations also argued that airport-related parking is appropriate at Town Centre hotels.</li> </ul>	<p><u>Policy EC7: Hotel &amp; Visitor Accommodation</u> Support for Policy EC7 is noted.</p> <p>Disagree with comment objecting to sequential test removal. CBC accept this is not covered in national policy but given particular circumstance of an international airport within the borough, consider the airport boundary an appropriate and sustainable location for hotel accommodation, which is predominantly for airport passengers and staff, and it is therefore unnecessary to require the sequential test.</p>
<ul style="list-style-type: none"> <li>Support was received for <b>Policies EC8 to EC11</b> inclusive from Crawley Town Centre BID.</li> </ul>	<p><u>Policies EC8 to EC11</u> Support is noted.</p>
<p><b>Gatwick Airport</b></p> <p><i>Comments on this Chapter were received from 14 representors. These included a local resident, a national government agency, the county council, landowners and planning agents, businesses and specific interest groups: CAGNE, Gatwick Area Conservation Campaign, Gatwick Airport Limited, Sussex Wildlife Trust, Natural England, West Sussex County Council, Ifield Village Conservation Area Advisory Committee, HX Properties Ltd., The Wilky Group, Woodland Trust, COIF Nominees Ltd., Ardmore/Windsor Land Consortium, one local resident and The Arora Group.</i></p> <p><i>Comments were received on Policies GAT1, GAT2 and GAT3.</i></p>	
<ul style="list-style-type: none"> <li>GACC and CAGNE object to the principle of any airport growth, and therefore, object to the support <b>Policy GAT1: Development of the Airport with a Single Runway</b> provides to growth of Gatwick on its main runway.</li> <li>The Sussex Wildlife Trust and Natural England consider the detailed wording of <b>Policy GAT1</b>, particularly requesting “impacts should be avoided” and emphasising biodiversity.</li> <li>GAL objects to the <b>Policy GAT1</b> requirements to minimise impacts and maximise benefits and infrastructure provision.</li> </ul>	<p><u>Policy GAT1: Development of the Airport with a Single Runway</u> Topic Paper 2: Gatwick Airport (Submission Document Reference DS/TP/02), section 3.2 sets out the council’s consideration of matters raised in representations relating to Policy GAT1.</p> <p>Detailed wording changes to the policy were made for the Further Regulation 19 Consultation (2023) (Submission Document Reference: CBLP/01), including further emphasis given to biodiversity and avoidance of impacts.</p>
<ul style="list-style-type: none"> <li>Support was received from GAL to <b>Policy GAT2: Safeguarded Land</b> in relation to maintaining safeguarding in line with National Policy Aviation Policy Framework 2013, but object to the removal of land for Strategic Employment allocation.</li> <li>Support was received from the Strategic Employment Site promoters to the extent of safeguarding being reduced and consider Gatwick Green can be delivered in a manner that is compatible with the future development of a southern runway. Minor mapping adjustments are proposed.</li> <li>Landowners in the remaining safeguarded area object to the continuation of safeguarding and sterilisation of potential employment sites, arguing that the Government decision to support Heathrow, the Gatwick Airport Northern Runway proposal, and national carbon</li> </ul>	<p><u>Policy GAT2: Safeguarded Land</u> Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02), section 2.2 summarises the national policy context for safeguarding for a potential future southern runway at Gatwick Airport.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy evolved.</p> <p>Topic Paper 2, section 3.6 summarises the work undertaken on the Crawley Western Multi-Modal Transport Link and the Systra Study Evidence (Submission Document Reference: ES/ST/02a-m) sets out the options considered and the reason a possible interim option is shown.</p> <p>The requirement to safeguard is a national policy requirement and the impact of potential future airport expansion on biodiversity assets and ancient</p>

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Main Issues	How this was taken into account?
<p>reduction commitments remove the need to safeguard land for a further southern runway at Gatwick. Arora request redevelopment of existing sites is permitted.</p> <ul style="list-style-type: none"> <li>WSCC question the conflict with <b>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road.</b></li> <li>Sussex Wildlife Trust and the Woodland Trust are concerned about biodiversity assets, including ancient woodland in the safeguarded area.</li> </ul>	<p>woodland would be considered through the Development Consent Order process.</p>
<ul style="list-style-type: none"> <li>Support was received from GAL to <b>Policy GAT3: Gatwick Airport Related Parking.</b></li> <li>Objections were received to <b>Policy GAT3</b>, primarily on the grounds of GAL's permitted development rights and role in the provision of airport parking, and the restriction of competition.</li> <li>Concern was raised by the Woodland Trust that on airport car parking is inappropriate within ancient woodlands.</li> </ul>	<p><u>Policy GAT3: Gatwick Airport Related Parking</u> Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02), section 3.7 explains the rationale and background to Policy GAT3, including Local Plan and appeal Inspectors' decisions and the High Court judgement, and the relationship between Policy GAT3 and the Gatwick Airport s106 (Submission Document Reference: EGSM/GA/05) and the Surface Access Strategy (Submission Document Reference: EGSM/GA/09).</p>
<ul style="list-style-type: none"> <li>GAL support <b>Policy GAT4: Employment Uses at Gatwick.</b></li> </ul>	<p><u>Policy GAT4: Employment Uses at Gatwick</u> Support noted.</p>
<p><b>Crawley Town Centre</b></p> <p><i>Comments on this Chapter were received from four representors. These included a neighbouring local authority, developers, businesses and specific interest groups: Crawley Town Centre Bid Board, Aberdeen Standard Investments, Horsham District Council and Aldi Stores Ltd.</i></p> <p><i>Comments were received on Policies TC1, TC3, TC4 and TC5.</i></p>	
<ul style="list-style-type: none"> <li>Responses were generally supportive of the proposed policy approach, considering this sufficiently flexible to support long-term Town Centre vitality and viability.</li> <li>Quod on behalf of Aberdeen Standard Investments supported the flexible approach to the Town Centre but considered the requirement to apply the <b>Policy EC2</b> 'loss of employment' test to represent a conflict with national policy.</li> <li>Horsham District Council questioned whether the cumulative 1,500 minimum residential units identified under <b>Policy TC3: Town Centre Key Opportunity Sites</b> is sufficiently ambitious in the absence of the Densification Study.</li> <li>Planning Potential on behalf of Aldi referred to the amended Class E and the scope for movement within this Use Class, and therefore considered the <b>Policy TC3</b> approach to be inconsistent with national policy.</li> </ul>	<p>Support for Town Centre policy approach is noted.</p> <p>Disagree with concerns raised regarding loss of employment criteria in town centre.</p> <p>The NPPF recognises the role of town centres for a range of activities including commercial, community and residential uses. The Town Centre is a main employment area, albeit one where there is scope for employment and residential uses to co-exist.</p> <p>The policy seeks to deliver a balanced approach between employment and residential uses within the Town Centre to retain its vitality and viability. Application of Policy EC2 loss of employment tests does not restrict the scope for upper floor changes of use to residential or community uses, as applications for residential or community use that meet the requirements can be permitted. Development satisfying Policy EC2 the loss of employment criteria can be permitted. The test is needed to ensure that residential is appropriately located and that the balance/location of commercial/ community/residential uses is appropriate to support long-term Town Centre vitality and viability.</p> <p>In relation to the quantum of residential development capacity within Crawley Town Centre,</p>

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Main Issues	How this was taken into account?
	<p>following this consultation, the Compact Residential Development Study, May 2023 (previously referred to as the Densification Study) (Submission Document Reference: WC/CLD/01) was updated so as to provide the rationale and guidance to justify and enable the requirements associated with higher density ranges be understood and applied on a site-specific basis (see Chapter 4, principles 1-4 and 6). Chapter 6 reassessed the potential unit yield and indicative density assumptions outlined in the earlier Strategic Housing Land Availability Assessment, January 2020 (SHLAA) (Submission Document Reference: H/HD/05). Desktop assessments were carried out for each site town centre key opportunity sites listed within the SHLAA resulting in some increases in site capacity, where considered appropriate (Submission Document Reference: H/HD/04).</p> <p>However, the town centre has always been considered an appropriate location for higher densities and the original site capacities reflected that. Furthermore, given slippage to Local Plan timetable as a result of water neutrality issues, some development has already come forward, meaning that the overall Local Plan residential development figure for Crawley Town Centre remains at 1,500.</p> <p>Disagree with criticism of Policy EC2 regarding retail food stores. Retail is considered an employment use, though it is also a Main Town Centre use, and applications for retail will be considered having regard to the relevant policies as appropriate. Applications for retail that are not in the Town Centre would need to meet the sequential and impact tests.</p> <p>Movement within Class E is outside of the scope of the Local Plan.</p>
<p><b>Housing Delivery</b></p> <p><i>Comments on this Chapter were received from 30 representors. These included ten local residents, neighbouring local authorities, national government departments and agencies, utilities providers, landowners and planning agents, businesses and specific interest groups: Inspired Villages, Sussex Ornithological Society, Horsham District Council, Pegasus Group, Southern Gas Networks (SGN), Danescroft (RLP Crawley) LLP, ten local residents, Waverley Borough Council, Gladman Developments, WSCC Property and Asset Management, St. Catherine’s Hospice, Tony Fullwood Associates, Homes England, Woodland Trust, Natural England, The Planning Bureau Ltd., Ifield Village Conservation Area Advisory Committee, Gatwick Airport Limited, Mid Sussex District Council, Sussex Wildlife Trust and Crawley Town Centre Bid Board.</i></p> <p><i>Comments were received on the Chapter’s introductory text as well as Policies H1, H2, H3, H3a, H3b, H3c, H3d and H3f.</i></p>	
<p><b>Housing Need (Policy H1)</b></p> <ul style="list-style-type: none"> <li>• Objections/concerns were received regarding <b>Policies H1: Housing Provision</b> and <b>H2: Key Housing Sites</b>, suggesting that housing needs</li> </ul>	<p><b>Policy H1: Housing Provision</b></p> <p>This Policy seeks to address Crawley’s identified housing need as far as possible, given the borough’s limited supply of land and existing</p>

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Main Issues	How this was taken into account?
<p>should be met within Crawley by building at higher densities rather than outside the borough boundary in areas of biodiversity value, which would be the effect of the strategy set out in <b>Policies H1 (Housing Provision) and H2 (Key Housing Sites)</b>.</p> <ul style="list-style-type: none"> <li>• Recommendations received from older people housing developer in relation to the Local Plan, including the inclusion of bespoke policy/policies setting specific delivery targets, development requirements and allocations in respect of housing for older people, with delivery to be monitored through the AMR.</li> <li>• Support is received to the ‘positive approach to meeting housing need in the Borough’ which is reflected in the emerging plan, noting that unmet housing need remains an issue affecting the wider sub-region.</li> <li>• Concerns raised that the plan must be ‘mindful of the cumulative impacts of policy on the viability and deliverability of residential development in the borough’.</li> <li>• Horsham District Council request that clearer evidence is provided to justify the proposed housing requirement (and resulting level of unmet need) by showing how proposed levels of development (e.g. for the sites in <b>Policy TC3</b>) have been arrived at, including through the completion of the Densification Study. HDC welcomes the increase to the windfall allowance from 55 to 90 dwellings per annum on the basis of evidence set out in the Windfall Statement.</li> <li>• Objections received to the approach taken in <b>Policy H1</b> as ‘unsound’ as the evidence provided is insufficient to justify a ‘supply-led’ housing requirement which does not fully meet the borough’s identified housing needs. The connection of housing to health and wellbeing as promoted by draft <b>Policy SD2</b> is highlighted.</li> <li>• Representations received suggest that in the absence of a clear plan for meeting unmet needs the Plan is unsound and non-compliant with the Duty to Cooperate.</li> <li>• Concern is raised that the Plan is overly reliant on already-identified sources of housing supply with insufficient work undertaken to identify new sources or establish whether sources already identified can provide increased supply.</li> <li>• Concerns and objections are received regarding consideration of alternative housing requirement figures within the SA, the proposal in <b>Policy H1</b> to adopt a ‘stepped’ housing requirement, the deliverability of the identified 5-year housing land supply.</li> </ul>	<p>constraints, including key constraints recognised in National Planning Policy. The rationale of the approach is set out further in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04).</p> <p>The suggestion that housing needs should be met within Crawley by building at higher densities, and compact development generally has been addressed in detail in response to representations towards Local Plan Chapter 4, Character, Landscape and Development Form (Submission Document Reference: CBLP/01).</p> <p>The Submission Local Plan (Submission Document Reference: CBLP/01) includes site allocations for housing for older people and housing for older people may come forward on other sites. Consideration of needs for different types of housing is set out more fully in Topic Paper 3: Housing Needs (Submission Document Reference: DS/TP/03). The Crawley Local Plan Monitoring and Implementation Framework (Submission Document Reference: KD/MIF/01) proposes to monitor delivery of specialist housing. Submission Local Plan Policy DD2: Inclusive Design seeks to ensure the adopted Local Plan policy approach of securing the application of Building Regulations Part M Category 2 – accessible and adaptable dwellings is implemented to ensure all new dwellings are capable of adapting to the changing needs of residents.</p> <p>Expressions of support are noted.</p> <p>CBC considers that the cumulative costs imposed by the Local Plan Policies and the Planning Obligations Annex are adequately taken account of in the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 and appendices (Submission Document References: DS/VA/02a and DS/VA/02b) and the Crawley Local Plan Viability Assessment Update, December 2022 (Submission Document References DS/VA/01a and DS/VA/01b).</p> <p>The council’s approach to making effective use of land in order to maximise the potential for delivery of residential development, while respecting site constraints, is explained in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04) and the Crawley Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01). It is reflected in Policies CL2: Making Successful Places – Principles of Good Urban Design; CL3: Movement Patterns, Layout and Sustainable Design; CL4: Compact Development – Layout, Scale and</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Resident representation considers that Crawley's housing need figure needs to be updated to reflect the most recently published inputs which form part of the standard method, reducing the annual figure from 750 dwellings to 718.</li> <li>Resident representation suggests amendments to the proposed <b>five year housing land supply buffer</b> in order to reduce the <b>unmet need</b> passed on to neighbouring authorities in the early part of the Local Plan period.</li> <li>Waverley Borough Council note the scale of <b>unmet housing need</b> arising from Crawley and welcomes the acknowledgement that discussions regarding the meeting of this unmet need will be focused on the Northern West Sussex Housing Market Area (HMA). States that Crawley's unmet need should be met within the same HMA and that Waverley Borough is unlikely to be able to take any additional need, being already required to accommodate some unmet need from Woking.</li> <li>Agreement is received confirming the council's need figure to be in accordance with the Government's standard method, subject to further updates in line with new affordability ratios. However, representations suggest that a need figure in excess of that resulting from the Standard Method is likely to be appropriate, given the intention of Gatwick Airport to bring the northern runway into regular use, subject to a DCO application. On this basis, it is suggested that the need figure should be revised accordingly before the level of housing delivery within the borough is established.</li> <li>The significant unmet need for housing identified in Policy H1 and the absence of an agreed strategy for meeting this need across the wider Housing Market Area (HMA) is noted. Representations consider that CBC should be undertaking further work to find sites for residential development within the borough before progressing with the submission of the plan.</li> <li>Support for the publication of a Statement of Common Ground (SOCG) between CBC, Horsham District Council, Mid Sussex District Council and West Sussex County Council in 2020, identifying the predicted amount of unmet need arising from Crawley, but concern is raised that there is no strategy for distributing that need across the local authority areas within the Northern West Sussex Housing Market Area.</li> </ul>	<p>Appearance; and CL5: Significant Development, Masterplanning and Design Success.</p> <p>The rationale of the proposed windfall allowance (now increased to 100 dwellings per annum) is set out in the Windfall Statement, May 2023 (Submission Document Reference: H/HN/06).</p> <p>The Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the methodology for assessing sites and individual site assessments.</p> <p>Topic Paper 4: Housing Supply (Submission Document DS/TP/04) includes Appendix A: 5 Year Housing Land Supply Statement which identifies a five-year housing supply in accordance with the NPPF deliverability definition, based on evidence as of May 2023.</p> <p>The Submission Policy H1: Housing Provision includes a calculation of need in accordance with the Standard Method, using a base year of 2023 and the 2022 median affordability ratio published in March 2023.</p> <p>The 5 Year Housing Land Supply is calculated using a 10% buffer as the council has stated that it is seeking to confirm its 5 Year Housing Land Supply through the Local Plan process.</p> <p>The approach to engagement with neighbouring authorities in respect of Crawley's unmet housing need and the outcomes of this are set out in the Duty to Cooperate Statement, July 2023 (Submission Document Reference: KD/DtC/01) and the Northern West Sussex Housing Needs Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/02).</p>

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Main Issues	How this was taken into account?
<p><u>Development outside Crawley's Boundaries</u></p> <ul style="list-style-type: none"> <li>Concern is raised regarding the removal of Policy H3g (Urban Extensions) from earlier draft and request received that para. 2.33 is amended to include wording giving stronger protection to the High Weald AONB and setting out requirements for Habitat Assessments in other urban extension locations.</li> <li>Sussex Wildlife Trust welcome the approach of setting out CBC's expectations in relation to the planning of urban extensions 'At Crawley', but suggests that doing this through Policy (as in former Policy H3g) rather than including this material in the supporting text (as now proposed) would help to ensure a 'consistent and accountable approach'.</li> <li>Horsham District Council express concern that this section is not effective because it seeks to shape development outside Crawley's administrative area, which is a matter for the Local Plans for the respective areas. Specifically concerned about suggestion that urban extensions should be meeting unmet needs (including affordable housing) arising from Crawley, given that Horsham District itself has very high assessed need for housing.</li> <li>Mid Sussex District Council object to paras. 12.17 to 12.23 on the basis it is not justified or effective as it relates to land outside Crawley's boundary and the specific discussion and requirements do not properly take account of the context of planning within Mid Sussex.</li> <li>Support is submitted from the planning agents for the property developers for development of a large site focused on Cottesmore Hotel and Country Club to the south of Crawley – outside of the borough's boundaries ('Cottesmore Village'). States that unmet housing need arising from Crawley lends support to the principle of developing this site, arguing that the Crawley Local Plan should identify the scale of this unmet need, 'its economic significance and the way in which these matters could be addressed'.</li> <li>Concern is raised about the detrimental impact of a western link road on the character of Ifield Village Conservation Area, and pedestrian access from the area to the surrounding countryside, with its associated open green space and woodland.</li> <li>Rusper Parish Council raise a number of concerns regarding the Land West of Ifield site 'that has been proposed under a duty to cooperate with Horsham District Council', and which 'would impact negatively on the proposed Crawley Local Plan'.</li> </ul>	<p>CBC considers that the Submission Local Plan paragraph 12.23 (Submission Document Reference: CBLP/01) represents an appropriate statement of the council's approach to engagement with strategic development proposals 'at Crawley', following the removal of the earlier draft Policy H3g (Submission Document Reference: CBLP/05).</p>

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Main Issues	How this was taken into account?
<p><u>Site Allocations (Policy H2)</u></p> <ul style="list-style-type: none"> <li>Support is received from the landowner for the allocation of <b>Land adjacent to Desmond Anderson, Tilgate</b>.</li> <li>Support is received from the planning agent on behalf of the landowner for the allocation of <b>St Catherine’s Hospice</b> current site on Malthouse Road, Southgate. However, concern is expressed that the proposed allocation for older people and those with disabilities is overly prescriptive, and that the policy should allow for more flexibility for potential development of the site for general needs housing. In addition, the representation suggests that the site can accommodate a higher density of development than envisaged in draft <b>Policy H2</b>. Detailed comments in relation to the design of the site were also provided.</li> <li>Support was received from the planning agent on behalf of a landowner to the allocation of <b>Land East of Street Hill</b> the site to deliver 15 dwellings and endorses the SHLAA assessment of the site as being suitable, available and achievable. However, the representations objects to criterion (v): ‘avoid harm to the species-rich meadow grassland which contributes to the Local Wildlife Sites (LWS)’.</li> <li>Objections were received to the proposed allocation of <b>Land East of Street Hill</b> as Housing, Biodiversity and Heritage site, on the basis of the sensitivity of the area in ecological and heritage terms, and the relatively limited contribution which it would make to meeting Crawley’s housing need.</li> <li>Resident representation objects to allocation of <b>Land East of Street Hill</b> on biodiversity, amenity, landscape and heritage grounds.</li> <li>Homes England, as landowner, proposes that a higher figure of 138 dwellings can be accommodated at <b>Tinsley Lane Playing Fields</b>, and also requests flexibility regarding requirements in respect of allotment provision.</li> <li>Resident representation expresses concern that the projected dwelling yield for the <b>Town Centre Broad Location</b> is expressed as a minimum, whereas this is not so with most other sites/Broad Locations. Concern is raised that this creates a risk that the Town Centre is treated as an ‘overfill’ area where any amount of residential development is acceptable.</li> <li>Support is received for the allocation of <b>Land SE of Heathy Farm</b>, with representation recommendations that this allocation be worded flexibly (in respect of dwelling yield and open space requirements) to allow indicative the</li> </ul>	<p><u>Policy H2: Key Housing Sites</u></p> <p>Policy H2 sets out the key housing allocations and broad locations for housing including specific policy requirements in relation to the development of some sites.</p> <p>The Reasoned Justification of the policy states that the dwellings totals given are (except for the case of Land East of Street Hill, Worth) indicative figures which could be exceeded subject to a policy compliant scheme.</p> <p>The Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the methodology for assessing sites and individual site assessments.</p> <p>The rational underpinning the suitability of the projected dwelling yield for the Town Centre Broad Location is outlined in particular in Chapter 4 and 5 of the Submission Local Plan (Submission Document Reference: CBLP/01) and within policies CL2-CL5 and DD1 and DD2 in particular as well as in Chapters 11 and 12 of the NPPF (2021, MHCLG).</p> <p>The background and rationale justifying higher density ranges and parameters related to this form of development is outlined in the National Design Guide and Model Design Code guidance, as well as the Crawley Compact Residential Development Study, May 2023, supporting the Submission Local Plan (Submission Document Reference: WC/CLD/01).</p> <p>Policy H1: Housing Provision identifies areas to the north of Langley Green and Forge Wood as areas of search for residential development, as reflected in the Local Plan Key Diagram, page 17 (Submission Document Reference: CBLP/01).</p> <p>The 2023 Submission Local Plan (Submission Document Reference: CBLP/01) amends the Policy text to clarify that the dwelling totals expressed in relation to Broad Locations are indicative rather than minimum totals.</p> <p>A number of the sites proposed for allocation which are subject to representations are allocated in the existing adopted Local Plan: Crawley 2030, December 2015 (Submission Document Reference: CBLP/02) including Land East of Street Hill, Worth, and Tinsley Lane Playing Fields, Three Bridges (the latter of which is also subject to an adopted Development Brief).</p> <p>Henty Close, Bewbush and Rushetts Road Play Area, Langley Green are not included as allocations in the 2023 Submission Local Plan (Submission</p>

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Main Issues	How this was taken into account?
<p>dwelling quantum to be exceeded where feasible. Changes are recommended to the ratings detailed against the site in the Sustainability Appraisal.</p> <ul style="list-style-type: none"> <li>• Woodland Trust object to allocations which include or are close to ancient semi-natural woodlands (<b>Forge Wood, Land SE of Heathy Farm, Tinsley Lane Playing Fields, Land adjacent to Desmond Anderson</b>).</li> <li>• Natural England expresses disappointment regarding allocation of <b>Land South East of Heathy Farm</b>, which is identified as deciduous woodland habitat. Notes other biodiversity / landscape / public right of way constraints within or adjacent to other proposed allocations.</li> <li>• Resident representations objected to allocation of <b>Land at Henty Close</b> on various grounds, including impact on local amenity, biodiversity, infrastructure and open space.</li> <li>• Resident representation objects to proposed allocation of <b>Rushetts Road Playing Area</b> on grounds of amenity, existing use, and loss of open space.</li> <li>• Request received from planning agents on behalf of developers to the consideration of <b>additional parcels of land in Forge Wood</b> for allocation as additional housing sites (and their reflection in the Local Plan housing requirement).</li> <li>• Planning agent on behalf of Southern Gas Networks (SGN) explain that SGN are exploring potential for redevelopment of <b>redundant gas holder sites, including that at Forge Wood</b>, which is planned to be demolished. Expresses concern that status of gas holder site at Forge Wood within the draft Plan is unclear, recommending that stronger support is expressed for principle of residential development there, and that further work is undertaken by the council to consider the development potential of the site.</li> </ul>	<p>Document Reference: CBLP/01). However, they are identified in the Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) as suitable sites which could come forward subject to availability. As such, they represent part of the basis for setting the proposed windfall allowance of 100 dwellings per annum which is set out in the Windfall Statement, May 2023 (Submission Document Reference: H/HN/06).</p> <p>The Forge Wood Gas Holder site is considered to be unsuitable for residential grounds, predominantly on the grounds of flood risk, as set out in the Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04).</p>
<p><u>Housing Typologies (Policies H3, H3a-f)</u></p> <ul style="list-style-type: none"> <li>• Further evidence is requested (notably completed densification study) to support identified housing requirement. <b>Policy H3a: Estate Regeneration</b> should be enlarged on (and informed by the completed Densification Study) to further demonstrate/exploit the potential for estate regeneration.</li> <li>• Support received for the ‘typology’ <b>Policies H3a: Estate Regeneration; H3b: Densification, Infill Opportunities, and Small Sites; H3c: Town Centre Residential Sites; H3d: Upward Extension; and H3f: Open Spaces</b> in principle.</li> </ul>	<p><u>Policy H3: Housing Typologies</u></p> <p>Policy H3 and the associated policies H3a-H3f seek to set out as far as possible how different types of opportunities for additional development within the Built-Up Area will be approached.</p> <p>The council’s approach to making effective use of land in order to maximise the potential for delivery of residential development while respecting site constraints is explained in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04) and the Crawley Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01) – an earlier version of which was titled ‘Densification Study’ and</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Support received for the flexible approach to town centre sites indicated by <b>Policies EC1: Sustainable Economic Growth; EC2: Economic Growth in Main Employment Areas; TC1: Primary Shopping Area; TC5: Town Centre First; H2: Key Housing Sites; H3c: Town Centre Residential Sites; and H5: Affordable Housing.</b></li> <li>Support for <b>Policies H3c: Town Centre Residential Sites; and H3d: Upward Extensions</b> was received from Crawley Town Centre BID, as means of ensuring efficient use of town centre sites and increasing residential densities.</li> <li>Objections received to cross-reference to <b>Policy EC2: Economic Growth in Main Employment Areas</b> in <b>Policies H3c: Town Centre Sites; and H3e: Conversions from Commercial/Non-residential Uses.</b></li> <li>Support in principle received from GAL for <b>Policy H3d: Upward Extensions</b> and welcomes amendments made in response to previous representations.</li> <li>Mid Sussex District Council: Refers back to previous expression of support for <b>Policy H3d.</b></li> </ul>	<p>published alongside the 2021 Local Plan Regulation 19 Consultation. The Study provided the rationale and guidance to justify and enable the requirements associated with higher density ranges to be understood and applied on a site-specific basis (see Chapter 4, principles 1-4 and 6).</p> <p>The rationale of the proposed windfall allowance, largely based on expectations for additional development sites within the Built-Up Area Boundary, is set out in the Windfall Statement, May 2023 (Submission Document Reference: H/HN/06).</p>
<p><b>Meeting Housing Needs</b></p> <p><i>Comments on this Chapter were received from five representors. These included landowners, developers and planning agents, businesses and specific interest groups: Home Builders' Federation, The Planning Bureau Ltd., Inspired Villages, Gladman Developments and Gatwick Airport Limited.</i></p> <p><i>Comments were received on Policies H5, H7 and H8.</i></p>	
<ul style="list-style-type: none"> <li>Representations from a planning agent on behalf of a landowner recommends that <b>Policy H4: Future Housing Mix</b> uses the same wording as in the existing policy.</li> <li>Concern is expressed regarding elements of <b>Policy H4</b> which are not considered to be positively worded, which are unclear or which are considered to have potential to frustrate the delivery of homes.</li> <li>Concern is expressed regarding the proposed market dwelling mix for the Town Centre, and the proposed affordable housing mix, as detailed in supporting text of <b>Policy H4</b>. These are considered to require too high a proportion of larger properties, and to have potential to negatively impact development viability.</li> <li>Concern is raised about the proposed affordable housing tenure mix in the Town Centre in <b>Policy H4</b>.</li> </ul>	<p><b>Policy H4: Housing Mix</b> CBC considers that there is a need for clear requirements in Policy H4: Housing Mix in order to support the effectiveness of the Policy.</p> <p>Monitoring, as set out in the Crawley Local Plan Authority Monitoring Report, 1 April 2020 – 31 March 2021 (Submission Document Reference: CB/AMR/02) has indicated that provision of smaller open market residential dwellings in recent years has been well in excess of local demand, and at the expense of providing family sized accommodation which is identified as needed within the borough in the Northern West Sussex Strategic Housing Market Assessment, November 2019 (Submission Document Reference: H/HN/01).</p> <p>The proposed dwelling mixes, informed by the Northern West Sussex Strategic Housing Market Assessment (Submission Document Reference: H/HN/01) are reflected in the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 and appendices (Submission Document References: DS/VA/02a and DS/VA/02b), and the Crawley Local Plan</p>

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	Viability Assessment Update, December 2022 (Submission Document References: DS/VA/01a and DS/VA/01b). these also take account of other policy requirements, as cumulative, including requirements in respect of affordable housing.
<ul style="list-style-type: none"> <li>The Home Builders Federation refer to the sensitivity of development viability in Crawley and support the proposal in <b>Policy H5: Affordable Housing</b> to reduce affordable housing requirements within the Town Centre. This lower level is also supported by other representations.</li> <li>The Home Builders Federation suggest that <b>Policy H5</b> is updated to reflect First Homes requirements.</li> <li>Concern is raised that specialist older persons' housing including sheltered and extra care housing should be exempt from affordable housing requirements in <b>Policy H5</b>. Specific technical responses are provided in relation to the council's viability evidence as regards older persons' accommodation. Representations received emphasised the concept of the 'retirement community' as a single planning unit, falling entirely within the C2 use class, where special considerations apply in relation to viability, and where it is not possible to provide on-site affordable housing.</li> </ul>	<p><u>Policy H5: Affordable Housing</u> Policy H5: Affordable Housing has been updated to take account of national policy in respect of First Homes.</p> <p>Further justification for the Policy H5 approach to sites of 1-10 dwellings is set out in Topic Paper 3: Housing Needs (Submission Document Reference: DS/TP/03).</p> <p>CBC considers that Policy H5: Affordable Housing, as now drafted, is consistent with and supported by the Crawley Local Plan &amp; Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/01a).</p>
<ul style="list-style-type: none"> <li>Variation to <b>Policy H7: Self and Custom Build</b> is recommended to link the requirements more closely to up-to-date evidence of demand.</li> <li>Concern is raised by house builders that the requirements of <b>Policy H7</b> are not fully justified by evidence of demand/supply of self-build and custom-built houses, and are not sufficiently taken account of in the viability assessment prepared in support of the Local Plan. The flexibilities/exceptions provided in the Policy are supported.</li> </ul>	<p><u>Policy H7: Self and Custom Build</u> Policy H7: Self and Custom Build is informed by the evidence of the council's Self-Build and Custom Housebuilding Register, which points to progressively increasing demand. The Policy allows for plots to be developed as speculative housing if they remain unsold following a 12-month period of marketing and it is considered that this is sufficient to allow for the unlikely possibility of supply for such plots exceeding demand.</p> <p>In relation to the viability of Policy H7, the position is set out in the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/02a).</p>
<ul style="list-style-type: none"> <li>GAL withdraws objection to <b>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</b> on basis that the proposed Plan reinstates a Policy (GAT2) safeguarding land for a second runway.</li> </ul>	<p><u>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</u> The withdrawal of the previous objection to Policy H8 is noted.</p>

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Main Issues	How this was taken into account?
<p><b>Green Infrastructure &amp; Biodiversity</b></p> <p><i>Comments on this Chapter were received from ten representors. These included local residents, landowners, developers and planning agents and specific interest groups: Ifield Village Conservation Area Advisory Committee, The Wilky Group, Woodland Trust, Natural England, Sussex Wildlife Trust, WSCC Property and Assets Management, Sussex Ornithological Society, Home Builders Federation, The Planning Bureau Ltd. and a local resident.</i></p> <p><i>Comments were received on Policies GI1, GI2, GI3 and GI4.</i></p>	
<ul style="list-style-type: none"> <li>• Support received from a Conservation Area Committee to <b>Policy GI1: Green Infrastructure</b>.</li> <li>• Concern is raised in relation to how it will be possible to retain Green Infrastructure with the demand for housing.</li> <li>• Woodland Trust welcomes <b>Policy GI1</b>, in particular relation to the use of Natural England's Accessible Natural Green Space standard and Woodland Trust's woodland access standard. Also welcomes the inclusion of requirement v11c, for large developments to provide new and/or create links to green infrastructure.</li> <li>• Support received to <b>Policy GI1</b> as appropriate and proportionate to the requirements for both green and blue infrastructure in accordance with national policy received from planning agents on behalf of a landowner promoting a site.</li> </ul>	<p><u>Policy GI1: Green Infrastructure</u></p> <p>Support for the inclusion of the Policy is noted.</p> <p>Support is noted for the inclusion of Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.</p> <p>Support for the appropriate and proportionate requirements is noted.</p>
<ul style="list-style-type: none"> <li>• Natural England welcomes the inclusion of the Green Infrastructure policy. Woodland Trust supported <b>Policy GI2: Biodiversity Sites</b> and strongly support the policy approach that development resulting in the loss or deterioration of irreplaceable habitats should be refused unless there are wholly exceptional reasons and a suitable compensation strategy exists. However, it should be strengthened with regard to buffering of ancient woodland. The policy approach in line with Natural England's standing advice is not believed to be sufficient. Instead, they consider the use of a 50m buffer as a precautionary principle.</li> <li>• Support for <b>Policy GI2</b> from Natural England.</li> <li>• Natural England highlighted that detrimental impacts to internationally designated sites in the vicinity, which have the potential to occur, need to be considered in relation to potential development within the Plan area and these sites should be referred to.</li> <li>• Representations received from Natural England confirmed that the Plan should demonstrate how the impacts at Arun Valley SPA and Special Area of Conservation (SAC) and Ramsar sites will be avoided and mitigated.</li> </ul>	<p><u>Policy GI2: Biodiversity Sites</u></p> <p>Support is noted for the inclusion of the Policy being appropriate and proportionate, and the approach to irreplaceable habitats.</p> <p>Paragraph 14.23 of the Submission Local Plan (Submission Document Reference: CBLP/01) sets out that a 15m buffer should be maintained between a development and ancient woodland as per Natural England Standing advice.</p> <p>Concerns were addressed within the policy, as the policy now includes internationally designated sites. Local Plan paragraph 14.25 recognises internationally and nationally designated sites outside of Crawley, including Arun Valley SOA, SAC and Ramsar sites and they could be affected by developments from within the borough.</p> <p>Concern raised has been addressed through the removal of past ecological surveys from the wording within the policy.</p> <p>Previous concerns raised have been addressed through amendments to the Local Plan Policy and supporting text (Submission Document Reference: CBLP/01).</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Support received from a site promoter for <b>Policy GI2</b>, as appropriate and proportionate for addressing Biodiversity and consistent with national policy.</li> <li>• Sussex Wildlife Trust (SWT) note the amendments have been made based upon their initial comments (to Regulation 19 consultation 2020).</li> <li>• Suggestion received that the first paragraph of <b>Policy GI2</b> should be amended: to remove section relating to past ecological surveys, as some sites may have not been previously surveyed but contain features that are recognised as valuable for wildlife.</li> <li>• Specific landowner requests for the removal of certain areas of Biodiversity Opportunity Areas under <b>Policy GI2</b> – this was a repeated representation from the previous Regulation 19 consultation carried out in 2020.</li> <li>• Sussex Ornithological Society concerned that there needs to be firmer protection relating to the High Weald AONB.</li> </ul>	<p>Local Plan paragraph 14.28 supports the inclusion of Biodiversity Opportunity Areas, to help protect and improve the natural environment.</p> <p>Policy CL9: High Weald Area of Outstanding Natural Beauty summarises that the High Weald AONB Management Plan will be used, and the council recognises its statutory duty to conserve and enhance the natural beauty of the High Weald AONB.</p>
<ul style="list-style-type: none"> <li>• Natural England support inclusion of <b>Policy GI3: Biodiversity and Net Gain</b>, in particular the need for proposals to demonstrate the securing of a Net Gain.</li> <li>• Detailed representations from Natural England suggested that <b>Policy GI3</b> could be strengthened through the addition 'measurable' when referring to the Net Gain achieved, in line with the NPPF; that net gain should be incentivised on-site in the first instance and showing that the mitigation hierarchy was followed; and demonstrate the securing of management for Net Gain in perpetuity for the life time of the development.</li> <li>• Natural England advised that SPD should be prepared to provide further details as to how Net Gain should be delivered and measured.</li> <li>• Representations received from the Conservation Area Committee suggested that there should be a requirement for ecological studies of proposed development sites to be made public, and knowledge from local community who know the area should be sought after in <b>Policy GI3</b>.</li> <li>• Representation from a site promoter supporting <b>Policy GI3</b> as provide appropriate and proportionate requirements to address biodiversity and net gain, and consistent with national policy.</li> <li>• Concerns raised by SWT to <b>Policy GI3</b> suggest that it fails to adequately address what is required where BNG cannot be secured on-site. Suggests that CBC has a strategic plan in place</li> </ul>	<p><u>Policy GI3: Biodiversity and Net Gain</u> Support for Policy GI3 for securing Biodiversity Net Gain and confirming that the policy is consistent with national policy is noted.</p> <p>Concerns raised have been addressed with amendments to the policy: "measurable" has been added to the policy wording. Topic Paper 8: Biodiversity Net Gain and Urban Greening, July 2023 (Submission Document Reference: DS/TP/08), section 2.1.7 confirms that all gains must be measurable.</p> <p>Topic Paper 8, section 3.1.6 sets out that Net Gain should be achieved in the first instance on site. The section also includes the mitigation hierarchy that should be followed, when delivering Biodiversity Net Gain.</p> <p>Topic Paper 8 summarises how biodiversity should be delivered within the borough of Crawley. Section 3.1.4 and 3.1.5 of Topic Paper 8 summarises the need to use the most up to date metric to measure biodiversity net gain.</p> <p>Topic Paper 8, section 3.1.7 summarises that if onsite is not feasible then offsite or credits should be sought to deliver the appropriate net gains.</p> <p>The Local Plan Schedule of Suggested Modifications, July 2023, page 204 (Submission Document Reference: CBLP/07 sets out that if on-site is not achievable then off-site net gains should be identified as part of a strategic solution, and if this is not possible then credits should be sought.</p> <p>The Submission Local Plan Policy (Submission Document Reference: CBLP/01) is consistent with</p>

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Main Issues	How this was taken into account?
<p>to deliver BNG that is required off-site, and to ensure that gains are strategic and maximised.</p> <ul style="list-style-type: none"> <li>• Representations received from planning agents on behalf of landowners are supportive of <b>Policy GI3</b> to deliver Biodiversity Net Gain which is in accordance with the Environment Bill (now The Environment Act).</li> <li>• Concern is raised that the wording of <b>Policy GI3</b> does not make provisions for when net gains cannot be achieved on-site whether that be partially or in full, and suggests wording that could be used to inform such circumstances.</li> <li>• Concern is raised that <b>Policy GI3</b> is repetitive of other policies in the Plan, in particular relation to tree replacement planting and landscaping and suggests that these two points should be removed.</li> <li>• The Home Builders Federation object to <b>Policy GI3</b>, considering it to not be consistent with national policy.</li> <li>• Support received for the commitment to achieving a minimum of 10% Net Gain.</li> <li>• Concern that clarity is needed in <b>Policy GI3</b> in relation to the contribution of one new tree per new dwelling (or equivalent off-site contribution) to confirm that either contribution is required or it is not. Concern is raised that the ambition to increase in tree cover in the borough may come as an obstruction to building at higher densities, and particularly may not be feasible for new urban developments on constrained sites. It was suggested that there should be a reduction in the number of additional tree planting in urban areas, and a separate cost for tree planting should be included in the Crawley Local Plan Review: Whole Plan Policies &amp; Community Infrastructure Levy Viability Assessment.</li> </ul>	<p>national policy and the Environment Act, supported by Topic Paper 8 (Submission Document Reference: DS/TP/08). Section 2 of Topic Paper 8 sets out the background of the Environment Act and the delivery of Biodiversity Net Gain, which is presented within the Policy.</p> <p>The Local Plan Policy GI3 sets out what is to be included and what is not included when calculating the Biodiversity Net Gains needed.</p>
<ul style="list-style-type: none"> <li>• Strong support was received for the designation of Ifield Brook Meadows and Rusper Playing Fields as Local Green Space (<b>Policy GI4: Local Green Space</b>), with them both being valued and important local features.</li> <li>• Resident representations received raised objections to development of Ifield Brook and Ifield Golf Club, with development impacting the environment and nature; historic flooding in the area and future flood risk; benefits that the area brings to peoples physical and mental health; and an increase in people in the area will increase congestion and traffic and place additional burden on Crawley.</li> <li>• Rusper Parish Council raised concerns about the Land at the West of Ifield: the proposed site would negatively impact upon Crawley's Local Plan.</li> </ul>	<p><b>Policy GI4: Local Green Space</b> Support is noted for Ifield Brook Meadows and Rusper Road Playing Fields designated as a Local Green Space.</p> <p>Ifield Brook Meadows and Rusper Road Playing Fields are protected from development as a designated Local Green Space through the adopted Local Plan: Crawley 2030, December 2015 (Submission Document Reference: CBLP/02) and the Submission Local Plan (Submission Document Reference: CBLP/01).</p> <p>The Crawley Borough Local Plan only relates to development within the administrative boundaries of the borough. It is not possible to plan for land outside these within neighbouring authorities. However, the Local Plan acknowledges that development has taken place and is being</p>

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Main Issues	How this was taken into account?
	<p>promoted on, and close to, the borough boundaries and such development will have an impact on Crawley – including visual and on its infrastructure capacity. Paragraphs 12.17-12.23 (Submission Document Reference: CBLP/01) set out Crawley Borough Council’s position when considering such developments.</p> <p>Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link (Submission Document Reference: CBLP/01) seeks to establish the area for further investigation should strategic development come forward on the western side of Crawley to provide a full transport connection between the A264 and A23. This is to minimise car traffic on the local highway network increasing congestion. It forms part of the strategy to ensure attractive direct active travel opportunities and priority bus transport to key employment locations and destinations, and ensures no motorised traffic crosses the Local Green Space designation.</p>
<p><b>Sustainable Design &amp; Construction</b></p> <p><i>Comments on this Chapter were received from three representors. These included a national government department and agency, landowners, developers and planning agents: Ardmore Ltd, The Planning Bureau Ltd. and Natural England.</i></p> <p><i>Comments were received on Policies SDC1, SDC2 and SDC3.</i></p>	
<ul style="list-style-type: none"> <li>• Representations from planning agent on behalf of landowner promoting a site set out how their masterplan area could be developed in accordance with the requirements of draft <b>Policy SDC1: Sustainable Design &amp; Construction, SDC2: District Energy Networks, and SDC3: Tackling Water Stress.</b></li> <li>• Representations consider that it should be left up to the developer how best to achieve the 19 per cent carbon reduction target detailed in <b>Policy SDC1</b> in respect of new dwellings.</li> <li>• Concern raised by representations received that the allowance made in the Local Plan Viability Assessment for enhanced sustainability standards is ‘stretched thin’.</li> </ul>	<p><u>Policy SDC1: Sustainable Design &amp; Construction</u></p> <p>Policy SDC1 (Submission Document Reference: CBLP/01) is considered to strike an appropriate balance between the need to ensure that development makes its contribution to climate change mitigation and the need to ensure that development remains viable. Further justification of the approach is set out in Topic Paper 6: Climate Change (Submission Document Reference: DS/TP/06).</p> <p>In relation to the viability of Policy SDC1, the position is set out in the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/02a).</p>
<ul style="list-style-type: none"> <li>• Natural England provided comments on <b>Policy SDC3</b>, though this feedback has largely been superseded by the need to address Water Neutrality within the Local Plan.</li> </ul>	<p><u>Policy SDC3: Tackling Water Stress</u></p> <p>The policy approach has now evolved with Policy SDC3 retaining the approach of the current adopted Policy, while Policy SDC4: Water Neutrality sets tighter on-site water efficiency requirements within the Sussex North Water Resource Zone (Submission Document Reference: CBLP/01), as part of the strategy for enabling development to come forward on a water neutral basis, in order to satisfy the Habitat Regulations (Submission Document Reference: KD/HRA/01).</p>

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Main Issues	How this was taken into account?
<p><b>Environmental Protection</b></p> <p><i>Comments on this Chapter were received from five representors. These included utilities providers, landowners, developers and planning agents and businesses and specific interest groups: The Wilky Group, SGN, Gatwick Airport Limited, Pegasus Group, Danescroft (RLP Crawley) LLP and Sussex Wildlife Trust.</i></p> <p><i>Comments were received on Policies EP1, EP3, EP4 and EP6.</i></p>	
<ul style="list-style-type: none"> <li>• Representations received from a site promoter considers <b>Policy EP1: Development and Flood Risk</b> to provide appropriate and proportionate requirements for addressing flood risk and surface water drainage considerations and is consistent with National Policy.</li> <li>• Representations from a planning agent on behalf of a landowner considers that its site should be allocated for residential and raise objection to the SHLAA having not taken this site forward on due to concerns of flood risk and land contamination (<b>Policy EP3: Land and Water Quality</b>).</li> </ul>	<p><u>Policy EP1: Development and Flood Risk</u> Support is noted.</p> <p>The Gas Holder site is located entirely within Flood Zone 3a. The Exception Test should not be used as a tool to justify development in flood risk areas where the sequential test has already shown that there are reasonably available lower risk sites appropriate for the proposed development.</p>
<ul style="list-style-type: none"> <li>• Gatwick Airport Limited, along with planning agents representing landowners and developers, provided detailed comments relating to the specific noise metrics used in <b>Policy EP4: Development and Noise</b> and the <b>Noise Annex</b>.</li> <li>• Representations from planning agents on behalf of a landowner question whether noise metrics should be included within the Local Plan.</li> </ul>	<p><u>Policy EP4: Development and Noise, and Noise Annex</u> Disagree with the representations against Policy EP4. It is appropriate for the Local Plan to include noise metrics, as supported by national policy.</p> <p>Comments are noted regarding the specific noise values set out in the Noise Annex. Topic Paper 7: Development and Noise Technical Appendix (Submission Document Reference: DS/TP/07) sets out the council's position.</p>
<ul style="list-style-type: none"> <li>• Representations received from Sussex Wildlife Trust requested amendment to <b>Policy EP6: External Lighting</b> to avoid unacceptable impacts on biodiversity.</li> </ul>	<p><u>Policy EP6: External Lighting</u> Text amendment has been made to Policy EP6 in order to address comments received in the representations.</p>
<p><b>Sustainable Transport</b></p> <p><i>Comments on this Chapter were received from 15 representors. These included a local resident, a neighbouring local authority, national government departments and agencies, the county council, landowners, developers and planning agents, businesses and specific interest groups: Ardmore/Windsor Land Consortium, Highways England, The Wilky Group, Gatwick Airport Limited, Home Builders Federation, The Planning Bureau Ltd., Crawley Town Centre Bid Board, a local resident, Sussex Ornithological Society, West Sussex County Council, Horsham District Council, Ifield Village Conservation Area Advisory Committee, Sussex Wildlife Trust, Woodland Trust and COIF Nominees Ltd.</i></p> <p><i>Comments were received on the Chapter in general as well as specific Policies ST1, ST2, ST3 and ST4.</i></p>	
<ul style="list-style-type: none"> <li>• Representations from planning agent on behalf of landowner promoting a site set out how their masterplan area can be delivered in consistency with Local Plan objectives on sustainable transport (<b>Policy ST1: Development and Requirements for Sustainable Transport</b>).</li> <li>• Representations received from Highways England (now National Highways) confirm that work is ongoing as part of the Transport Study</li> </ul>	<p><u>Policy ST1: Development and Requirements for Sustainable Transport</u> The Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a) was initially published in May 2021, updated in June 2022 and is now supported by the Crawley Transport Modelling Study TN02 GAL Sensitivity Test, June 2023 and Crawley Transport Modelling Study TN03 Gatwick Green Trip Generation</p>

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Main Issues	How this was taken into account?
<p>to establish the impact of the Local Plan on the strategic road network.</p> <ul style="list-style-type: none"> <li>• Representations received from a site promoter considers that the approach set out in <b>Policy ST1</b> is consistent with national and CBC corporate policy and strategies, and sets out that the proposed Gatwick Green allocation (promoted by the representor) is consistent with this policy and with <b>Policy ST2: Car and Cycle Parking Standards</b>.</li> <li>• Representations received from Gatwick Airport Limited (GAL) raise no objection to draft <b>Policy ST1</b>.</li> </ul>	<p>Comparison, June 2023 (Submission Document Reference: ES/ST/01w).</p> <p>Work with National Highways and West Sussex County Council is reflected in the Northern West Sussex Statement of Common Ground (Submission Document Reference: SoCG/01), the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a) and the Crawley Borough Council and West Sussex County Council Statement of Common Ground (SoCG/16).</p>
<ul style="list-style-type: none"> <li>• Support is received from planning agents on behalf of landowners for the 'parking behaviour zones' identified in the Parking Standards Annex, referred to in <b>Policy ST2</b>.</li> <li>• Concern is raised by the Home Builders Federation about lack of specific allowance within the <b>Local Plan Viability Assessment</b> for cost of providing electric vehicle charging points.</li> <li>• The inclusion of local standards for installation of EV charging points is queried given that national requirements are being introduced via Building Regulations.</li> <li>• Support is received for the element of flexibility in the <b>Parking Standards Annex</b> (referred to in <b>Policy ST2</b>) in respect of vehicle parking for older persons' accommodation.</li> <li>• Concern is expressed regarding the requirement for a quota of active EV charging points as part of parking provision. As an alternative it is suggested that cabling could be provided to parking spaces, to be used for 'live' charging points at a later stage as needed. Sets out that cycle parking should not be required for residents of specialist older persons' accommodation.</li> </ul>	<p><u>Policy ST2: Car and Cycle Parking Standards</u> Expressions of support are noted.</p> <p>The Crawley Local Plan Viability Assessment Update, December 2022 (Submission Document Reference: DS/VA/01a) tests for additional costs associated with requirements to provide electric vehicle charging points.</p> <p>It is anticipated that national standards for provision of EV charging infrastructure will be in place at the time of adoption of the Crawley Borough Local Plan and that the requirements of Policy ST2 will not exceed these.</p>
<ul style="list-style-type: none"> <li>• GAL confirm that following modification of <b>Policy ST3: Improving Rail Stations</b>, the previous objection to the policy no longer applies.</li> <li>• Representations from the Crawley Town Centre Business Improvement District support <b>Policy ST3</b> in relation to Crawley Station in terms of the scope for enhanced pedestrian/cycling accessibility, better public transport provision, and better integration with the main shopping area.</li> </ul>	<p><u>Policy ST3: Improving Rail Stations</u> Withdrawal of previous objections noted. Policy as updated is considered to reflect the roles, potential, characteristics and constraints of individual railway stations.</p> <p>Support for policy noted.</p>
<ul style="list-style-type: none"> <li>• Resident Representations suggest the playing fields which would be affected by a southern runway at Gatwick Airport and/or a new link road for new development at the West of Ifield (<b>Policy ST4: Safeguarding of a Search</b></li> </ul>	<p><u>Policy ST4: Safeguarding of a Search Corridor for a Crawley Western Link Road</u> Concerns to Policy ST4 are noted.</p> <p>Policy ST4 (now referred to as Area of Search for a Crawley Western Multi-Modal Transport Link) seeks</p>

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Main Issues	How this was taken into account?
<p><b>Corridor for a Crawley Western Link Road</b> should be replaced through the Local Plan.</p> <ul style="list-style-type: none"> <li>• Sussex Ornithological Society confirmed their representations to <b>Policy ST4</b> made as part of the Regulation 19 2020 consultation continue to stand.</li> <li>• Representations from WSCC raise concern that <b>Policy GAT2: Safeguarded Land</b> for the potential future additional wide spaced runway as per the Gatwick Airport Master Plan is in conflict with <b>Policy ST4</b> as substantial sections of the ST4 area lies within the GAT2 safeguarded area.</li> <li>• Horsham District Council (HDC) support <b>Policy ST4</b>, subject to the need for the corridor for any future relief road to be agreed jointly with HDC as most of the route would be within the administrative area of Horsham.</li> <li>• Objections received from planning agent on behalf of a site promoter to <b>Policy ST4</b> in its current form and the Proposals Map allocation as well as the principle of safeguarding land for a relief road, as premature.</li> <li>• Representations received from the Conservation Area Committee to <b>Policy ST4</b> acknowledge its purpose, but raise concerns regarding the environmental impacts.</li> <li>• GAL maintains its previous objection to <b>Policy ST4</b> and confirms, that since the reinstatement of the policy safeguarding land for future runway expansion to the south of Gatwick Airport, this is now strengthened by the inherent inconsistency between <b>Policies GAT2</b> and <b>ST4</b>.</li> <li>• Representations received from Sussex Wildlife Trust (SWT) raise concern as to the need for the link road and its impacts on biodiversity. The broad area appears to cover areas of known biodiversity value including a Local Wildlife Site and ancient woodland. SWT does not feel the current policy wording reflects the clear need with the NPPF section 175 to follow the mitigation hierarchy and avoid impacts in the first instance.</li> <li>• Support received from the Woodland Trust to the supporting text to <b>Policy ST4</b> confirming new highways crossing across Ifield Brook Meadows would be wholly unacceptable.</li> <li>• Concern received from the Woodland Trust to <b>Policy ST4</b> that the search area for the proposed link road includes ancient woodland at Rowley Wood ASNW.</li> <li>• Representations received from Rusper Parish Council raise concerns that the western link road would have an adverse effect on Ifield Brook Meadows as the proposals seem to have</li> </ul>	<p>to establish the area for further investigation should strategic development come forward on the western side of Crawley to provide a full transport connection between the A264 and A23. This is to minimise car traffic on the local highway network increasing congestion. It forms part of the strategy to ensure attractive direct active travel opportunities and priority bus transport to key employment locations and destinations, and ensures no motorised traffic crosses the Local Green Space designation.</p> <p>Work was commissioned by the council, in partnership with West Sussex County Council, in response to concerns raised by key stakeholders as part of the Additional Local Plan Regulation 19 consultation, held in 2021. The Crawley Western Link Road Study, May 2023 (Submission Document Reference: ES/ST/02) sought to refine the Area of Search corridor shown on the Local Plan Map and referred to in Policy ST4. It included the involvement of key stakeholders: Gatwick Airport Limited, Environment Agency, Horsham District Council and Homes England.</p> <p>Amendments to the Submission Local Plan Policy wording and supporting text (Submission Document Reference: CBLP/01), as well as the alignment of the Area of Search on the Local Plan Map (Submission Document Reference: CBLP/M/01) have been made to reflect the evidence from the Study and clarify the purpose of the Policy.</p> <p>The policy is proposed to allow for further work to be carried out in order to address impacts on the borough's infrastructure in the event strategic development takes place adjacent to the western side of Crawley.</p>

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Main Issues	How this was taken into account?
<p>cycle ways through parts of this Conservation Area.</p>	
<p><b>Noise Annex</b>  <i>Comments relating to the Noise Annex were received from one representor: a local resident.</i>  <i>Other detailed representations were received in relation to noise and the Noise Annex which have been detailed above in Environmental Protection – Policy EP4: Development and Noise.</i></p>	
<ul style="list-style-type: none"> <li>Concern the contour map is not clear enough.</li> </ul>	<p>Feedback is noted.</p>
<p><b>Duty to Cooperate</b>  <i>Comments relating to the Duty to Cooperate were received from five representors: a local resident, Squires Planning, Gladman Developments Ltd, Reigate and Banstead Borough Council and The Sogno Family Trust.</i></p>	
<ul style="list-style-type: none"> <li>Resident Representations consider the Duty to Cooperate has failed, as it gives Crawley insufficient control of land beyond its built-up edges.</li> <li>Representations from Reigate and Banstead Borough Council confirms the Statement of Common Ground agreed between the two authorities and signed in February 2021.</li> <li>Concerns are raised by planning agents for landowners in relation to the extent of Statements of Common Ground agreed by the council and its neighbouring authorities, suggesting the Local Plan fails in meeting the Duty to Cooperate.</li> <li>Representations suggest there needs to be updated Statement of Common Grounds agreed which confirm the extent of unmet needs that can be accommodated by the neighbouring authorities.</li> </ul>	<p>The approach to engagement with neighbouring authorities in respect of Crawley’s unmet housing need and the outcomes of this are set out in the Duty to Cooperate Statement, July 2023 (Submission Document Reference: KD/DtC/01), the Northern West Sussex Housing Needs Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/02) and in the SoCGs with other authorities (Submission Document References: SoCG06-12).</p> <p>Confirmation of the up-to-date position with Reigate and Banstead Borough Council is noted and welcomed. This is reflected in the council’s Duty to Cooperate Statement (Submission Document Reference: KD/DtC/01) and the Crawley Borough Council and Reigate and Banstead Borough Council Statement of Common Ground (Submission Document Reference: SoCG/09).</p> <p>Crawley Borough Council has written formally to the other authorities in the area where a potential strategic link could be considered in relation to the borough’s emerging unmet needs. Other neighbouring authorities are at different stages of their Local Plan preparation to Crawley Borough Council. However, positive agreement has been reached with these confirming the cross boundary discussions and joint working over the Northern West Housing Market Area and with authorities beyond (particularly within, but not restricted to, the Gatwick Diamond and West Sussex Greater Brighton areas). This is fully detailed in the council’s Duty to Cooperate Statement (Submission Document Reference: KD/DtC/01) and the series of Statements of Common Ground agreed and published (Submission Document References: SoCG/01 – SoCG/014).</p>

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### Main Issues

### How this was taken into account?

#### Sustainability Appraisal/Strategic Environmental Assessment

*Comments on the Sustainability Appraisal/Strategic Environmental Assessment were received from seven representors: Sussex Ornithological Society, The Wilky Group, Reigate and Banstead Borough Council, HX Properties Ltd., Danescroft (RLP Crawley) LLP, Gladman Developments and Squires Planning.*

<ul style="list-style-type: none"> <li>• Sussex Ornithological Society confirmed their representations to SA/SEA made as part of the Regulation 19 2020 consultation continue to stand.</li> <li>• Representations received from a site promoter consider that the SA/SEA has been prepared in accordance with the advice in the Planning Practice Guidance (PPG), and that specifically its assessment in relation to Strategic Policies EC1 and EC4 and Policy GAT2 is sound.</li> <li>• Representations from Reigate and Banstead Borough Council raise concern that the SA/SEA does not assess the sustainability of the option of not allocating a land to meet identified B8 need in respect of Policy EC4. This is considered a failure of the SA/SEA to consider all reasonable options.</li> <li>• Objections are received from a planning agent on behalf of a car park operator the SA/SEA is deficient, inadequate and unsound where the appraisal concerns Policy GAT3.</li> <li>• Concern is raised that the evidence base was incomplete at the time of the SA/SEA preparation and this respect the conclusions of the SA cannot be relied upon and a further SA should be undertaken once the evidence base is complete.</li> <li>• Representations highlight that the results of the SA process need to clearly justify the policy choices, in particular, in meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed, and others have been rejected.</li> <li>• Concerns are raised by a planning agent on behalf of a residents' group in relation to how the SA/SEA assesses Policy EC4 has been considered and the final policy solution arrived at. In particular, concerns are raised in relation to: insufficient evidence to prepare SA; the spatial approach to meeting Crawley's land use needs; prejudicing the delivery of a second runway, should it be required by national policy; assessment of Economic Growth Options; and the assessment of Policy Option.</li> </ul>	<p>Representations received against the SA/SEA have been published in its Appendix at each stage of public consultation (Submission Document References: KD/SA/02, Appendix B and C, and KD/SA/03, Appendix B, C and D).</p> <p>The council has revisited the SA/SEA and updated and amended it where considered appropriate (Submission Document Reference: KD/SA/01). This has included updating the Site Assessment for Policy EC4 and other proposed employment sites.</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p>
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### How this was taken into account?

#### Local Plan Map

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

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

Comments are noted.

The council are not proposing to make any adjustments to the Built-Up Area Boundary at present.

Gatwick Green site boundary has been amended to reflect feedback from the site promoter.

Proposed new residential site allocation unsuitable for a variety of reasons including aircraft noise, as set out in the Sustainability Appraisal/Strategic Environmental Assessment (Submission Document Reference: KD/SA/01) and the Strategic Housing Land Availability Assessment (SHLAA), February 2023 (Submission Document Reference: H/HD/04).

Amendments have been suggested in the Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) to reflect WSCC feedback following the Further Local Plan Regulation 19 consultation, 2023.

The mapping error highlighted in the representations at Manor Royal has been addressed.

No further amendments have been made to safeguarding boundary. The reasons for this are set out in Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02) section 3.4.

#### Habitats Regulations Assessment

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

- Reigate and Banstead Borough Council (RBBC) acknowledge the draft HRA takes into account their previous representations made to the Regulation 19 2020 consultation.
- RBBC do not dispute the conclusions that the Bechstein's bat habitat (at Mole Gap to Reigate Escarpment Special Area of Conservation) will not be affected by the Local Plan and habitat loss and fragmentation will not be considered further in the HRA process, in line The Bat Conservation Trust ("BCT") guidance on thresholds for Core Sustenance Zones ("CSZ").
- RBBC do not dispute the decision that the site will not be considered further in the HRA process in terms of public access and disturbance, but recommend that strong consideration is taken for any large development sites.

The Habitats Regulations Assessment Report, January 2023 (Submission Document Reference: KD/HRA/01) provides a table summarising the representations received at each stage of public consultation and how these have been addressed (Table 3.2, pages 22-25).

A report relating to the work undertaken in relation to the Habitats Regulations was published at every stage of Local Plan formal consultation (Regulation 18 and each of the three Regulation 19 consultations). This included the scoping and screening reports prepared in-house (Submission Document References: KD/HRA/03 and KD/HRA/04). When feedback from emerging evidence indicated there was a need for an Appropriate Assessment to be carried out, this was undertaken and published in draft (Submission Document Reference: KD/HRA/02) prior to the final report, January 2023, being published alongside the

## Additional Publication Consultation (Regulation 19): January – June 2021

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• RBBC raise significant concern with regards to potential impacts from Policy EC4 Strategic Employment Location site development as it does not include freight traffic to/from the planned logistics site, which will be a much more significant part of the site traffic than employees' cars.</li> <li>• Mid Sussex District Council remain concerned about the HRA work undertaken to support the Crawley Local Plan as it appears that no detailed transport modelling, air quality modelling and ecological interpretation to assess any impact on the Ashdown Forest SAC has been undertaken and considers that this modelling work and the next version of the HRA will need to be undertaken prior to submission of the Local Plan for examination.</li> <li>• Natural England highlight the issue of Hardham groundwater abstraction serving Southern Water's Sussex North Water Resource Zone, and emerging evidence which indicates that an adverse effect on the integrity of the Arun Valley SAC, SPA and Ramsar features could not be excluded with certainty. Whilst the adverse effect remains or is uncertain, development in Crawley must be certain not to add to this adverse effect. This will need to be tested through Crawley Local Plan's HRA, and again we welcome ongoing involvement in this process and the work that Crawley has undertaken thus far to assess this impact through the HRA. Once this has been completed it will support the test of soundness for the Local Plan. This requirement should be an essential target in the Sustainability Appraisal. With clear links to the quantum of housing numbers coming forward.</li> </ul>	<p>Submission Local Plan consideration through the committee cycle to Full Council in February 2023 and for Publication Regulation 19 Consultation in May 2023 (Submission Document Reference: KD/HRA/01).</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p> <p>The council has worked jointly with the other affected Local Authorities within the Southern Water Sussex North Water Resource Zone, along with Natural England, Southern Water, Environment Agency, Defra, DLUHC and Ofwat to address the issues around water supply impacts on Internationally designated sites. This has included the preparation and agreement/endorsement of the Water Neutrality Study (Submission Document References: ES/SDC/05 - ES/SDC/07) and the agreement of a Water Neutrality Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/03). A summary of the issue and work carried out is set out in the Water Neutrality Topic Paper, May 2023, and Progress Update, July 2023 (Submission Document Reference: DS/TP/00). Work is ongoing to secure the full Implementation Scheme (Sussex North Offsetting Water Scheme) and pilots are already progressing within Crawley.</p>
<p><b>Viability Assessment</b>  <i>Comments relating to the Viability Assessment were received from two representors: The Planning Bureau Ltd. and Gladman Developments.</i></p>	
<ul style="list-style-type: none"> <li>• Concern was raised relating to the delay in publishing the Viability Assessment.</li> <li>• Concern was raised regarding the preparation of the Local Plan ahead of the Viability Assessment to ensure it was fully informed by the outcomes to ensure proposed policies do not place such additional burdens which would render developments unviable.</li> </ul>	<p>All of the evidence supporting the Local Plan formed part of the iterative development of the Local Plan. The emerging information was prepared alongside, and fed into, the Local Plan's preparation and decisions on policy drafting, requirements and site allocations. The decisions were then reflected in the final published evidence.</p> <p>The Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/02a) and appendices was published as part of the 2021 Local Plan Regulation 19 Consultation, allowing three months for representations to consider this evidence before the close of</p>

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Main Issues	How this was taken into account?
	<p>consultation at the end of June 2021. The Crawley Local Plan Viability Assessment Update, December 2022 (Submission Document Reference: DS/VA/01a) was published in January 2023, in advance of the 2023 Regulation 19 consultation, as part of the committee reporting cycle ahead of the Full Council held in February 2023.</p> <p>On this basis, all viability evidence documents were publicly available by the time of the 2023 Local Plan Regulation 19 consultation.</p>
<p><b>Strategic Housing Land Availability Assessment</b>  <i>Comments relating to the Strategic Housing Land Availability Assessment was received from one representor: SGN.</i></p>	
<ul style="list-style-type: none"> <li>North East Sector, Gas Holder site (Site Ref: 73): the council should work positively and proactively to overcome constraints and brownfield land within the Forge Wood Neighbourhood should be defined and classified as residual land in which the principle of development is supported. A further assessment of the site and wider area should be undertaken to determine its development potential.</li> </ul>	<p>The Forge Wood Gas Holder site is considered to be unsuitable for residential development, predominantly on the grounds of flood risk, as set out in the Crawley Strategic Housing Land Availability Assessment (Submission Document Reference: H/HD/04).</p>
<p><b>Local Development Scheme</b>  <i>Concerns were raised by one representor in relation to the Local Development Scheme: Squires Planning</i></p>	
<ul style="list-style-type: none"> <li>Evidence documents were not published before the start of the consultation, and so had been left out of drafting the Local Plan.</li> <li>The consultation was due to end after the timetabled submission, and so would not be in conformity with the Local Development Scheme, which would not be rectifiable through retrospective changes.</li> </ul>	<p>All of the evidence supporting the Local Plan formed part of the iterative development of the Local Plan. The emerging information was prepared alongside, and fed into, the Local Plan's preparation and decisions on policy drafting, requirements and site allocations. The decisions were then reflected in the final published evidence.</p> <p>All outstanding finalised evidence was published during the course of the Publication consultation, with the consultation being extended to ensure a minimum of 6 weeks for comments to be submitted following the last published evidence (the Transport Modelling Study).</p> <p>The delays caused by the extended consultation, and then the subsequent delays due to the unexpected issues regarding water supply in relation to the Habitats Regulations (i.e. water neutrality), meant a new Local Plan programme had to be prepared. This was not possible to do until the work on water neutrality was sufficiently progressed to provide certainty and clarity for the Local Plan.</p> <p>An updated Local Development Scheme was agreed in January 2023 (Submission Document Reference: CB/LDS/01) and the Local Plan has progressed against that timetable.</p> <p>All evidence documents supporting the Local Plan were published in advance or alongside the Further</p>

## Additional Publication Consultation (Regulation 19): January – June 2021

Main Issues	How this was taken into account?
	<p>Local Plan Regulation 19 Consultation, 2023. Some updates have been made to a small number of these subsequently as part of the submission.</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Local Development Scheme, Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p>
<p><b>Statement of Community Involvement</b></p>	
<p><i>Concerns were raised by one representor in relation to the Statement of Community Consultation: Squires Planning</i></p>	
<ul style="list-style-type: none"> <li>• There has been insufficient consultation with stakeholders and preparation of the necessary evidence to support the proposed policies and allow meaningful engagement with the public through this Regulation 19 consultation.</li> <li>• This is not in the spirit of the Council's Statement of Community Involvement and may fail the legal compliance test in this regard.</li> </ul>	<p>The Local Plan Review has included a comprehensive early engagement stage of consultation (Regulation 18) and three separate stages of Regulation 19 consultation, and has been through approval at the meeting of the Full Council at each of the Regulation 19 stages. At each consultation stage, the council's Statement of Community Involvement (CB/SCI/01) Submission Document Reference: and the formal Local Plan Regulations 2012 have been followed.</p> <p>The approach taken to each of the public consultations on the Local Plan is set out in detail in the Consultation Statement, and the associated Appendices provide the materials used and the representations received in full for each consultation period (Submission Document References: KD/CS/01a-KD/CS/01j). These have been published and updated at every stage of consultation.</p> <p>Regulation 18 Consultation (Submission Document Reference: CBLP/06) included questions regarding how best can employment needs be accommodated within the borough.</p> <p>The Local Plan Review Regulation 19 consultation carried out in 2021 was extended over a 6 month period (from 6 January – 30 June 2021), allowing a minimum of 6 weeks following the publication of the last remaining evidence document (Transport Modelling Study). Throughout the consultation, updates were provided in relation to the Local Plan.</p> <p>The evolution of the Local Plan meant that the proposed allocation of the Strategic Employment Site occurred following the first Regulation 19 consultation, as this replaced the previously intended approach for removal of Safeguarded Land for Gatwick Airport and the progression of an Area Action Plan for North of Crawley (as set out in Topic Paper 2: Gatwick Airport, Submission Document Reference: DS/TP/02).</p> <p>Letters were sent to residents in the locality of the proposed Strategic Employment Site at the start of</p>

**Additional Publication Consultation (Regulation 19): January – June 2021**

<b>Main Issues</b>	<b>How this was taken into account?</b>
	<p>the Consultation providing detailed background information to the proposal and notifying them of the public consultation on the Local Plan (pages 45-47, Consultation Statement Appendix 5, Submission Document Reference: KD/CS/01g).</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Local Development Scheme, Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p>

## 4. Further Publication Consultation (Regulation 19): May – June 2023

Further Publication Consultation (Regulation 19): May – June 2023	
Main Issues	How this was taken into account?
<p><b>Local Plan General &amp; Vision</b></p> <p><i>General comments on the Local Plan and its vision were received from nine representors. These included national government agencies, developers/landowners; business and specific interest groups: National Highways; Gatwick Airport Limited; Environment Agency; Network Rail; Natural England; WT Lamb Properties, the Dye Family and Elliot Metals/the Simmonds Family; Gatwick Green Ltd.; Save West of Ifield Campaign; and A2 Dominion.</i></p> <p><i>Comments were received on the strategic approach to transport, housing including unmet needs and urban extensions, Gatwick Airport, economy, health care provision and infrastructure facilities and the environment, particularly water quality.</i></p>	
<ul style="list-style-type: none"> <li>Request for further demonstration regarding the consistency of the Local Plan with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of sustainable development', in order to confirm that the Plan is consistent with national policy.</li> <li>Concern that the plan does not meet 'positively prepared' soundness test given scale of unmet housing need and the apparent lack of clear plans for meeting this need across the wider HMA. This is of concern given the potential impact which options for displacement of residential development into neighbouring districts could have on the Strategic Road Network.</li> <li>Concern that the plan falls short of meeting the 'justified' soundness test because the Crawley Transport Study does not make proportionate allowance for the scale of development which could come forward in the later part of the Local Plan period, and the forecast year given in the Study (2035) falls five years before the Local Plan end date (2040).</li> <li>Issues were raised in respect of the level of unmet housing need and the apparent lack of clear plans for meeting this within the HMA, as well as apparent deficiencies regarding the Transport Study and Infrastructure Plan. Concern that the plan falls short of meeting the 'effectiveness' soundness test as a result.</li> <li>Concern that the plan strategy fails to take adequate account of the 2019 Gatwick Airport Masterplan and progress made in relation to Development Consent Order proposals in respect of the northern runway.</li> <li>Concern that the plan strategy does not accord with the need to safeguard land for the potential delivery of an additional wide-spaced southern runway and associated infrastructure during the Local Plan period.</li> <li>Concern that the plan strategy is based on an underestimation of economic growth potential and associated demand for employment land.</li> </ul>	<p><b>Transport</b></p> <p>Ongoing work with National Highways is reflected in the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a). This confirms the work agreed as part of the preparation of the Local Plan and since the close of the 2023 Local Plan Regulation 19 consultation. It also establishes the outstanding work areas, including production of a checklist setting out how the Local Plan strategy follows the approach detailed in Circular 01/2022.</p> <p>The Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a) is now supported by the Crawley Transport Modelling Study TN02 GAL Sensitivity Test June 2023 which considers the effects of Gatwick Airport's Development Consent Order proposals, and Crawley Transport modelling Study: TN03: Gatwick Green Trip Generation Comparison June 2023 (Submission Document Reference: ES/ST/01w).</p> <p>As noted in the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a) and the Crawley Borough Council and West Sussex County Council Statement of Common Ground (Submission Document Reference: SoCG/16), further work is being undertaken with West Sussex County Council and National Highways to provide further assurance regarding the deliverability of the transport mitigations identified in the Infrastructure Plan.</p> <p><b>Unmet Housing Needs</b></p> <p>The approach to engagement with neighbouring authorities in respect of Crawley's unmet housing need and the outcomes of this are set out in the Duty to Cooperate Statement 2023 (Submission Document Reference: KD/DtC/01), the Northern West Sussex Housing Needs Statement of Common Ground July 2023 (Submission Document Reference: SoCG/02), and in the Statements of</p>

## Further Publication Consultation (Regulation 19): May – June 2023

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Recommendation of variation to wording of discussion of urban extensions in <b>paragraphs 2.30-2.33</b>.</li> <li>• Concern that the strategy is undermined by Crawley Borough Council's limited influence over strategic development proposed immediately outside the borough boundary, e.g. the West of Ifield proposals being promoted by Homes England.</li> <li>• Concern that the strategy provides insufficient clarity as to how additional healthcare provision and other facilities will be delivered, and insufficient appreciation of increased strain on local facilities arising from strategic development proposed adjacent to the borough.</li> <li>• A clearer statement of intention is requested in relation to the pursuit of partnership working as a means to improve water quality.</li> <li>• Other general comments were made regarding the suitability of the Local Plan Vision and soundness of the overall strategy.</li> </ul>	<p>Common Ground with other authorities (Submission Document References: SoCG/06-12).</p> <p><i>Approach to Safeguarding.</i> The approach regarding safeguarding is discussed in detail in Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02). Section 2.2 summarises the national policy context for safeguarding for a potential future southern runway at Gatwick Airport.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan evolved following the Initial Local Plan Regulation 19 Consultation (Submission Document Reference: CBLP/05).</p> <p><i>Re: Critiques of employment figures set out in the Local Plan.</i> The council's approach to identification of economic need is discussed in detail in Topic Paper 5: Employment Needs and Land Supply (Submission Document Reference: DS/TP/05).</p> <p>Section 4 summarises evidence from the Northern West Sussex Economic Growth Assessment 2020 (Submission Document Reference: EGSM/EG/07) and its Crawley focused updates 2020 (Submission Document Reference: EGSM/EG/06) and 2023 (Submission Document Reference: EGSM/EG/05).</p>
<p><b>Sustainable Development</b></p> <p><i>Comments on this Chapter were received from five representors. These included those from neighbouring local authorities, national government agencies and specific interest groups: National Highways; Woodland Trust; Sport England; Save West of Ifield Campaign; and Mid Sussex District Council.</i></p> <p><i>Comments were received in relation to Policies SD1 and SD2, as well as the removed SD3.</i></p>	
<ul style="list-style-type: none"> <li>• <b>Policy SD1: Presumption in Favour of Sustainable Development</b> requires closer alignment with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of sustainable development'.</li> </ul>	<p><u>Policy SD1: Presumption in Favour of Sustainable Development</u></p> <p>Ongoing work with National Highways is reflected in the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a). This confirms the work agreed as part of the preparation of the Local Plan and since the close of the 2023 Local Plan Regulation 19 consultation. It also establishes the outstanding work areas, including production of a checklist setting out how the Local Plan strategy follows the approach detailed in Circular 01/2022.</p>
<ul style="list-style-type: none"> <li>• <b>Policy SD2: Enabling Healthy Lifestyles and Wellbeing</b> requires stronger emphasis on need for 'visions' for developments, incorporating sustainable travel principles in accordance with Department for Transport Circular 01/2022: 'Strategic road network and the delivery of sustainable development'.</li> </ul>	<p><u>Policy SD2: Enabling Healthy Lifestyles and Wellbeing</u></p> <p>Support is noted.</p> <p>Strategic development outside of the borough's administrative boundaries is not within the scope of the Crawley Borough Local Plan. However, discussions regarding the impacts of such</p>

## Further Publication Consultation (Regulation 19): May – June 2023

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• <b>Policy SD2</b> gives inadequate recognition of the impact on existing health services and community facilities arising from strategic development proposed adjacent to the borough.</li> <li>• Minor changes to supporting text of <b>Policy SD2: Enabling Healthy Lifestyles and Wellbeing</b> are requested in order to reflect updated Sport England principles statement.</li> </ul>	<p>development proposals have formed part of the ongoing Duty to Cooperate work the council is involved in with its neighbouring authorities and other prescribed bodies and infrastructure providers. This is detailed in the Duty to Cooperate Statement (Submission Document Reference: KD/DtC/01), the agreed Statements of Common Ground (including Submission Document References: SoCG/01; SoCG/02; SoCG/07-SoCG/10) and in Submission Local Plan paragraphs 12.17-12.23 (Submission Document Reference: CBLP/01).</p>
<ul style="list-style-type: none"> <li>• Expression of disappointment regarding deletion of <b>Policy SDC3: North Crawley Area Action Plan</b>.</li> </ul>	<p><u>Removal of Policy SD3: North Crawley Area Action Plan</u> The council's approach regarding removal of Policy SD3 is set out through Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02), section 3.4.</p> <p>Text throughout the Local Plan has been amended to reflect deletion of this policy (Submission Document Reference: CBLP/01).</p>
<p><b>Character, Landscape &amp; Development Form</b> <i>Comments on this Chapter were received from 14 representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, local residents and specific interest groups: Ardmere Ltd; Mid Sussex District Council; Horsham District Council; local resident; Chichester District Council; Muller Property Group; Gatwick Green Limited; Universities Superannuation Scheme Ltd.; Ifield Society; Sussex Ornithological Society; Homes England; Manor Royal BID; Save West of Ifield Campaign; and Natural England.</i></p> <p><i>Comments were received on Policies CL3, CL4, CL6, CL7, CL8 and CL9.</i></p>	
<p><u>Movement Patterns, Layout and Sustainable Urban Design</u></p> <ul style="list-style-type: none"> <li>• Claim that <b>Policy CL3: Movement Patterns, Layout and Sustainable Urban Design</b> renders the Strategic Employment Allocation at Gatwick Green unsound and unjustified.</li> <li>• Clarification from Mid Sussex District Council that previous comments made in March 2020 and June 2021 remain relevant.</li> </ul>	<p><u>CL3: Movement Patterns, Layout and Sustainable Urban Design</u> The Strategic Employment allocation in the northeast of the borough can be planned and designed so that it connects to and extends existing sustainable movement infrastructure, specifically, Fastway routes 10 and 100.</p>
<p><u>Compact Development – Layout, Scale and Appearance</u></p> <ul style="list-style-type: none"> <li>• Support for <b>Policy CL4: Compact Development – Layout, Scale and Appearance</b> in principle, but consider it is not justified as stands.</li> <li>• Horsham District Council sought that a further update to the evidence base document to provide a spatial analysis of what density ranges are appropriate in given contexts, more explanation of the methodology for determining them and a presentation of the town's existing density levels.</li> <li>• Mid Sussex supported <b>Policy CL4</b> in principle but suggested that the Policy would be more effective if the 'appropriate levels of</li> </ul>	<p><u>CL4: Compact Development – Layout, Scale and Appearance</u> Support is noted.</p> <p>Two clear density range categories are identified in Policy CL4 (i)-(ii) as appropriate for compact development (Submission Document Reference: CBLP/01). The Policy lists specific geographical locations where minimum higher density ranges must be achieved by new proposals unless existing character justifies a lower figure in a given context.</p> <p>In addition, the Compact Residential Development Study, May 2023, paragraph 6.6 - 6.7 and Map 1 and 2, illustrates the approximate maximum</p>

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Main Issues	How this was taken into account?
<p>accessibility to enhance public transport services' are defined.</p> <ul style="list-style-type: none"> <li>• Concern that 'dwellings per hectare' as a means of definition is rather vague.</li> <li>• General comment that distance between dwellings should be defined within <b>Policy CL4</b>, particularly as it relates to fire regulations and maintenance requirements.</li> <li>• Support for the high-density targets for the Town Centre and accessible locations.</li> </ul>	<p>geographical extent of these areas (Submission Document Reference: WC/CLD/01).</p> <p>Chapter 6 of the study reassessed individual sites their specific contexts and the potential for increased unit numbers by reviewing density range assumptions outlined in the earlier Strategic Housing Land Availability Assessment (SHLAA), January 2020 (Submission Document Reference: H/HD/05). It documents the desktop assessments for each site listed in the SHLAA categories where major allocations are expected to be deliverable during the Local Plan period, and this is reflected in the Strategic Housing Land Availability Assessment (SHLAA) February 2023 (Submission Document Reference: H/HD/04).</p> <p>Large geographical areas of the borough are listed in Policy CL4 where minimal higher density ranges must be achieved, unless existing character justifies a lower figure. Submission Local Plan Strategic Policy CL2 and paragraphs 4.24-4.31 (Submission Document Reference: CBLP/01) set out how local character must guide and dictate the form of new development, referencing national guidance, the 2020 review of the Heritage Assessment of key heritage and character areas in Crawley (Submission Document References: WC/H/01-WC/H/08), as well as the borough's 2009 Baseline Character Assessment (Submission Document Reference: WC/CLD/02). The 2009 Assessment also outlines the overall pattern and distribution of the town's existing density ranges.</p> <p>For all site-specific contexts (not just those with designated landscape or heritage settings) Submission Local Plan paragraph 4.30 (section 1, 2 and 4) in particular, note how it is possible to identify and chart the physical elements, as well as the more elusive perceptions of a place, which all work together to form an area's character.</p> <p>Should further compact development proposals come forward as windfalls during the Local Plan period, outside of the areas listed in Policy CL4 (and in addition to the site specific Local Plan allocations) Local Plan Policies CL2-5 would apply, with Chapter 4 principles 1-4 and 6 of the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CD/01) setting out the overall rationale and guidance needed to justify and enable appropriate new compact form to be determined on a site-specific basis.</p> <p>Appropriate levels of accessibility to enhance public transport is defined in the Submission Local Plan in paragraph 4.42 (Submission Document Reference: CBLP/01). The rationale and background for this is</p>

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Main Issues	How this was taken into account?
	<p>outlined in principle 2, chapter 4 of the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01).</p> <p>Measurement definitions and detailed design guidance (such as distances between dwellings) is outlined in national design guidance, Building Regulations, Submission Local Plan, Chapter 5 (Submission Document Reference: CBLP/01) and Crawley's adopted Urban Design Supplementary Planning Document, October 2016.</p>
<p><u>Structural Landscaping</u></p> <ul style="list-style-type: none"> <li>Query regarding the methodology used in identifying, determining and justifying individual plots or specific areas of structural landscaping established by <b>Policy CL6: Structural Landscaping</b>.</li> <li>Concern that the policy appears to be attempting to introduce a new layer of protection where none currently exists and that the wording of the Policy and some of the areas identified as Structural Landscaping make the policy unsound.</li> </ul>	<p><u>Policy CL6: Structural Landscaping</u></p> <p>The response to the issues raised during the previous 2021 Local Plan Regulation 19 Consultation regarding methodology, determining and justification of individual plots or specific areas of structural landscaping established remains relevant.</p>
<p><u>Important and Valued Landscape and Views</u></p> <ul style="list-style-type: none"> <li>Support that <b>Policy CL7: Important and Valued Landscape and Views</b> is broadly in accordance with the advice in the National Planning Policy Framework (NPPF, 2021) and the Planning Practice Guidance (PPG).</li> <li>Support that <b>Policy CL7</b> provides appropriate and proportionate protection for important and valued views in the borough,</li> <li>Support the commitment to protect and/or enhance Important and Valued Views.</li> <li>Concern regarding long distance views portion of the policy. Suggestion that it should be edited to clarify that each development's impact should be considered on its own merits.</li> </ul>	<p><u>Policy CL7: Important and Valued Landscape and Views</u></p> <p>Support is noted.</p> <p>Regarding long distance views, this Policy is retained from the adopted Local Plan: Crawley 2030, December 2015 (Submission Document Reference: CBLP/02). Whilst each proposal is considered on its own merits, Policy CL2, the NPPF and national guidance all place greater weight regarding decision making on the protection of existing character assets, both within a wider district setting and site-specific context.</p>
<p><u>Development Outside the Built-Up Area</u></p> <ul style="list-style-type: none"> <li>The Ifield Society requested <b>Policy CL8: Development Outside the Built-Up Area</b> is modified to include a submitted proposal for a Local Nature Reserve and Heritage Site- as part of the West of Ifield Rural Fringe.</li> <li>Sussex Ornithological Society claim that that the Local Plan is unsound in: <ul style="list-style-type: none"> <li>(a) proposing to allow or support development in the High Weald Area of Outstanding Natural Beauty (AONB) in the borough and beyond;</li> <li>(b) failing to have identified and safeguarded ecological networks;</li> <li>(c) in deferring cross-boundary strategic matters that should have been addressed;</li> <li>(d) not complying with the NPPF requirement for an environmental objective that protects and enhances the natural environment.</li> </ul> </li> </ul>	<p><u>Policy CL8: Development Outside the Built-Up Area</u></p> <p>Comments are noted. CBC recognise that development has commenced. CBC is comfortable to review this part of the Built-Up Area Boundary once development is sufficiently advanced and/or complete but would not review Built-Up Area Boundary based on a technical commencement.</p> <p><u>Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link</u></p> <p>Disagree with comment that Policy ST4 is inconsistent with Policy CL8: Development outside Built-Up Area.</p> <p>The Crawley Western Link Road Study (Submission Document Reference: ES/ST/02a) was undertaken following the previous Regulation 19 consultation (2021) to refine the Area of Search shown on the Local Plan Map and referred to in Policy ST4. The</p>

## Further Publication Consultation (Regulation 19): May – June 2023

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Claim that the Local Plan allows or supports further development that would remove green space and wildlife habitats in the High Weald AONB, and in the Tilgate area.</li> <li>• Claim that <b>Policy CL8</b> implies potential support for new development delivered by neighbouring councils in the AONB.</li> <li>• Claim that <b>Policy CL8</b> does not sufficiently recognise the council’s duty to safeguard the ecological networks that cross the boundaries of the borough into adjacent council areas.</li> <li>• Claim that the Local Plan is unsound in not complying with the NPPF requirement for an environmental objective that protects and enhances the natural environment.</li> <li>• Suggestion that there is no evidence in the Local Plan of work done to identify wildlife-rich habitats, wider ecological networks and wildlife corridors as required by the NPPF – particularly in the “area of search” for the proposed western relief road.</li> <li>• Suggestion that duty to cooperate requirements have not been addressed, in relation to ecological issues, with adjoining councils.</li> <li>• Ardmore Ltd request that the <b>Built-Up Area Boundary</b> (BUAB), as it relates to the Upper Mole Farmlands Rural Fringe, should be realigned to take into account of their site.</li> <li>• Manor Royal BID recommend the review of the countryside policies in light of continued safeguarding and the Area of Search for the Multi-Modal Transport Link Corridor.</li> <li>• Claim that the BUAB is at odds with <b>Policy ST4</b> for the Crawley Western Multi-Modal Transport Corridor Link.</li> <li>• Claim that <b>Policy CL8</b> is unsound and unjustified as the development at Jersey Farm indicates a need to review the BUAB on the proposals map.</li> <li>• Homes England supports <b>Policy CL8</b> and supporting text in <b>paragraph 4.70</b>.</li> <li>• Homes England suggest some modifications to the <b>Ifield Fringe Character Area</b>.</li> <li>• Clarification from Mid Sussex District Council that previous comments made, from January 2020, continue to apply.</li> <li>• Save West of Ifield Campaign requested that <b>Policy CL8</b> be updated to reflect the Crawley Borough Council Full Council motion, passed unanimously on 20th October 2021, that ‘Crawley Borough Council formally re-states its strongest possible opposition to the Homes England proposal to build up to 10,000 new homes to the west of Ifield/Crawley’.</li> </ul>	<p>route options identified within the evidence study are indicative only for the purposes of assessing a reasonable range of possible options, and do not suggest a preferred or final route option in any case.</p> <p>An alternative Area of Search is suggested for the interim period unless and until such a time when a southern runway is pursued by Gatwick Airport. Given that this use would be interim only, there is not justification for a permanent urbanising of land between the interim area of search and the Built-Up Area Boundary.</p> <p>It is also important to note that the full area of search would not be developed as a transport link, this is simply shown on the Local Plan Map as an area for further investigation and more detailed work would be needed for the exact alignment of a transport corridor.</p> <p>In addition, a substantial amount of landscaping would also be anticipated as part of any detailed proposals to take account of the flood plain, rural landscape, local biodiversity, heritage and heritage landscape assets and visual intrusion (as required by Submission Policy ST4 and other relevant policies in the Submission Local Plan, including Policy CL8: Development Outside the Built-Up Area; Policy ENV1: Green Infrastructure; Policy ENV3 Biodiversity and Net Gain; and EP6: External Lighting). At this stage it would not be appropriate to remove any land from outside the Built-Up Area Boundary on this basis.</p>

**Further Publication Consultation (Regulation 19): May – June 2023**

Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Request that <b>Policy CL8</b> should be updated to reflect the need to control types of excessively bright and spreading security lights on existing buildings.</li> </ul>	
<ul style="list-style-type: none"> <li>Natural England confirmed general support for <b>Policy CL9: High Weald Area of Outstanding Natural Beauty</b> requirements for relevant proposals to consider impacts on the High Weald AONB.</li> </ul>	<p><u>Policy CL9: High Weald Area of Outstanding Natural Beauty</u> Support noted.</p>
<p><b>Design &amp; Development Requirements</b></p> <p><i>Comments on this Chapter were received from eight representors. These included neighbouring local authorities, national government agencies, landowners and planning agents, and specific interest groups: Thames Water; Horsham District Council; Woodland Trust; Natural England; Surrey County Council; Oxford Match Ltd.; The Planning Bureau; and Gatwick Airport Limited.</i></p> <p><i>Comments were received on Policies DD1, DD3, DD4, DD5, and DD6.</i></p>	
<p><u>Normal Requirements of All New Development</u></p> <ul style="list-style-type: none"> <li>Suggestion that <b>Policy DD1: Normal Requirements of All New Development</b> should contain the requirement that a technical assessment should be undertaken by the developer or by the council in consultation with Thames Water for any proposed development within 800m of Crawley Sewage Works.</li> <li>Support by Horsham District Council, stating that <b>Policy DD1</b> is clear in its encouragement of efficient use of land as part of good design.</li> <li>Support for <b>Policy DD1</b> by Woodland Trust, particularly in relation <b>DD1g</b> and <b>paragraph 5.15</b> that where loss of trees should be mitigated by new planting.</li> <li>Support also for <b>Policy DD1</b> requirement <b>DD1g</b> by Natural England.</li> <li>Surrey County Council support the requirement for waste and recycling storage to be designed into new housing development schemes from the start (<b>Policy DD1, criteria i</b>).</li> <li>Surrey County Council raised concern that a requirement for the sustainable management of construction, demolition, and excavation waste is not included. That such a requirement is in accordance with West Sussex Waste Local Plan 2014, Policy W23: Waste Management within Development.</li> </ul>	<p><u>Policy DD1: Normal Requirements of All New Development</u> Support is noted.</p> <p>The Local Plan should be read as a whole. Paragraph 8.11 of the Reasoned Justification to the Policy (Submission Document Reference: CBLP/01) includes commentary on the specific issue of Waste Water Treatment. Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 7, includes a proposed hyperlink to Thames Water’s pre-planning enquiry service.</p> <p>The issue of waste associated with the development process is addressed by Policy SDC1: Sustainable Design &amp; Construction.</p>
<p><u>Standards for all New Developments – Including Conversions</u></p> <ul style="list-style-type: none"> <li>Concern that <b>Policy DD3: Standards for all New Developments – Including Conversions</b> criteria iv encourages minimum clear floor to ceiling height of 2.7m for 3-person 2-bedroom units and above.</li> <li>Concern that <b>Policy DD3 criteria v</b> requires private outdoor open space to be 2.5m deep by 4m wide, and is potentially too large for town centre schemes,</li> </ul>	<p><u>Policy DD3: Standards for all New Developments:</u> Only moderate and high-density range residential development is encouraged to achieve 2.7m clear floor to ceiling heights and usable private outdoor space for 3-person, 2-bedroom units and above, in addition to the Nationally Described Space Standards.</p> <p>Developers are also encouraged to consider the needs of families in the layout of flats which differ from those of non-family households. Paragraph 5.4 states that design and residential amenity</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Claim that <b>Policy DD3</b> will not make the most efficient use of deliverable land, and particularly constrain town centre sites, and that <b>Policy DD3</b> could undermine and conflict with <b>Policies CL2 and CL3</b> (using land more efficiently and sustainably).</li> <li>The Planning Bureau repeated its concern that the policy fails to properly consider the cumulative impact of what it expects new development to achieve due to the associated development costs <b>Policy DD3</b> places on new development.</li> <li>Suggestion that the council should instead remove <b>Policy DD3</b> and only rely on the Nationally Described Space Standards (NDSS) and the suggestion that there is no need to repeat government policy within <b>Policy DD3</b>.</li> </ul>	<p>standards need to improve as new development now has to be more compact and sustainable in order to make efficient use of land. This rational and background related to this need is explored in detail in Chapter 4, principles 6 and 7 of the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01).</p> <p>Rather than constraining town centre sites and undermining the requirements and aims outlined in Submission Local Plan Policies CL2-CL4 (Submission Document Reference: CBLP/01), Policy DD3 instead builds upon their macro aims for compact form and efficient use of land. It considers the needs of a wider spectrum of end user, in order to make Crawley Town Centre more attractive to a wider residential market than is currently the case and encourage a larger, more viable and dependable town centre rental and buyer market.</p> <p>The Policy and Reasoned Justification particularly aims to guide the design of higher density range typologies (and related amenity) in such a way that it attracts more families to the town centre (Submission Document Reference: CBLP/01).</p>
<p><u>Policy DD4: Tree Replacement Standards</u></p> <ul style="list-style-type: none"> <li>Thames Water supports the reference to take existing sewage and water infrastructure into account when planting trees and recognises the environmental benefits of planting trees. Also highlights that for the public sewers and water supply network to operate satisfactorily, trees and shrubs should not be planted over the route of the sewers or water pipes.</li> <li>The Woodland Trust supports <b>Policy DD4: Tree Replacement Standards</b> proposed ratio for tree replacement, which also reflects the Woodland Trust Guidance. In addition, the Trust also welcomes the inclusion of guidance in <b>paragraph 5.37</b> that, where possible, UK sourced and grown tree stock to support biodiversity and resilience.</li> <li><b>Policy DD4</b> is also supported by Natural England as it is in line with the NPPF and commitments and actions of the EIP.</li> <li>Comments received from the Planning Bureau reiterate <b>Policy DD4</b> has not been amended in light of their original objections.</li> </ul>	<p><u>Policy DD4: Tree Replacement Standards</u> Support noted.</p> <p>The background and justification for this Policy is outlined in the 2021 Strategic Policy DD1 (g) and paragraphs 5.6-5.7, 5.10 and 5.13-5.14, as well as in Chapter 4, Policy CL6 and Strategic Policy CL2, and paragraphs 4.4, 4.9-4.11, 4.17, 4.23-4.24 and 4.27-4.28 and 4.29 (1) (Submission Document Reference: CBLP/01).</p>
<p><u>Policy DD5: Aerodrome Safeguarding</u></p> <ul style="list-style-type: none"> <li>Gatwick Airport Limited support the policy and welcomed amendments made following the last round of public consultation. GAL has suggested further modifications to the supporting text to ensure their technical accuracy.</li> </ul>	<p><u>Policy DD5: Aerodrome Safeguarding</u> Support is noted.</p> <p>CBC has suggested modifications to address Gatwick Airport's concerns, based on their suggestion. See Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) pages 3-5.</p>

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Main Issues	How this was taken into account?
<p><b>Heritage</b></p> <p><i>Comments on this Chapter were received from five representors. These included a national government agency, landowner/developers and a specific interest group: Historic England; Gatwick Green Limited; Save West of Ifield Campaign; Chichester College Group; and Muller Property Group.</i></p> <p><i>Comments were received on the Chapter as well as specific Policies HA1, HA4, and HA5.</i></p>	
<ul style="list-style-type: none"> <li>• Support for the overall approach proposed to the conservation and enhancement of the historic environment, with <b>Policy HA1: Heritage Assets</b> as the strategic policy.</li> <li>• Acknowledgement of update to Heritage evidence base in the form of the 2021 Crawley Heritage Assets Review.</li> <li>• Commentary supporting consistency of <b>Policy HA1, HA4: Listed Buildings and Structures, and HA5: Locally Listed Buildings</b> with <b>Policy EC4: Strategic Employment Location.</b></li> <li>• Query as to why list of designated and non-designated heritage assets in <b>Policy HA1</b> does not mention village greens or Ifield Village Green, which does not appear on the Local Plan Map.</li> </ul>	<p><u>Policy HA1: Heritage Assets</u> Expressions of support are noted.</p> <p>Village Greens are a specific designation related to the use of space for lawful sports and pastimes by the local community. It is not intrinsically a heritage-based designation. CBC consider that Ifield Village Green has appropriate recognition as a heritage asset, as an important feature of Ifield Village Conservation Area which is recognised in the relevant Conservation Area Statement.</p>
<ul style="list-style-type: none"> <li>• Objection that <b>Policy HA5</b> goes beyond National Policy in the level of protection given to Locally Listed Buildings.</li> <li>• Objection to approach/evidence in relation to application of <b>Policy HA5</b> to assessment of individual buildings, as based on the 2021 Crawley Heritage Assets Review.</li> </ul>	<p><u>Policy HA5: Locally Listed Buildings</u> CBC considers that the Policy is appropriate to this type of non-designated heritage asset and does not agree that the protection given to locally listed buildings by the Policy is equal to that given to statutorily Listed Buildings.</p> <p>CBC notes the expression of objections to some specific proposals for local listing which are made in the evidence base supporting the Local Plan. However, Policy HA5 is not the instrument for identifying individual locally listed buildings. Instead this is to be done by a separate Local Heritage List SPD, on the basis of criteria identified in the policy (i.e. in paragraph 6.34, Submission Document Reference: CBLP/01). CBC notes that the representations on this Policy do not appear to object to the criteria proposed.</p>
<p><b>Open Space, Sport &amp; Recreation</b></p> <p><i>Comments on this Chapter were received from four representors. These included the County Council, a national government agency and specific interest groups: Save West of Ifield Campaign; Woodland Trust; Natural England; and West Sussex County Council.</i></p> <p><i>Comments were received on the Chapter as well as specific Policies OS2 and OS3.</i></p>	
<ul style="list-style-type: none"> <li>• A generic comment for Chapter 7 was submitted, which finds the policies in this Chapter to be sound but drew attention to the impacts on Crawley and its residents, should Horsham District Council progress the proposed West of Ifield development, referencing Ifield Golf Course, Ifield Brook Meadow and the rural fringe.</li> </ul>	<p>Comment noted. The Crawley Borough Local Plan cannot set the planning policies for land outside the borough's administrative boundaries.</p> <p>Paragraphs 12.17-12.23 seek to highlight the strategic matters the council would wish to be considered by the relevant neighbouring authority in any strategic developments on or close to the administrative boundaries 'At Crawley'. In particular, criteria 12.23 i and 12.23 include considerations</p>

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Main Issues	How this was taken into account?
	relevant to the provision of open space and recreation facilities.
<ul style="list-style-type: none"> <li>Comments were received in support of <b>Policy OS2: Provision of Open Space and Recreational Facilities</b>. The Woodland Trust supports the inclusion of Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland. Natural England supports the policy as it is line with the NPPF and goals and actions of the EIP.</li> </ul>	<p><u>Policy OS2: Provision of Open Space and Recreational Facilities</u> Support has been noted for the inclusion of Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.</p>
<ul style="list-style-type: none"> <li>West Sussex County Council commented on <b>Policy OS3: Public Rights of Way and Access to the Countryside</b>, withdrawing their previous comments made as the Policy has been changed to be more positively prepared and in accordance with the NPPF.</li> </ul>	<p><u>Policy OS3: Public Rights of Way and Access to the Countryside</u> Policy OS3 has been amended to reflect the wording in the NPPF.</p>
<p><b>Infrastructure Provision &amp; Infrastructure Plan</b></p> <p><i>Comments on this Chapter were received from 11 representors. These included the county councils, government agencies, infrastructure providers, a landowner and planning agent, a business and a specific interest group: Thames Water; West Sussex County Council; Gatwick Green Limited; Gatwick Airport Limited; Environment Agency; NHS Sussex ICB; Save West of Ifield Campaign; Surrey County Council; National Highways; Homes England; and 90 North Group Limited.</i></p> <p><i>Comments on the Infrastructure Plan were received from four representors: West Sussex County Council; Environment Agency; Surrey County Council and Network Rail.</i></p> <p><i>Comments were received on Policies IN1 and IN2 as well as on the Infrastructure Plan.</i></p>	
<ul style="list-style-type: none"> <li>Expressions of support for the overall approach set out in <b>Policy IN1: Infrastructure Provision</b> and <b>Policy IN2: The Location and Provision of New Infrastructure</b>.</li> <li>Comments regarding need for engagement between the council, developers and Thames Water as the sewerage provider in respect of proposed developments.</li> <li>Recommendation that wording be included in <b>Policy IN1</b> regarding waste water infrastructure, including statement that occupation may be restricted by phasing condition where there are capacity constraints, and information regarding process for securing a sewerage connection.</li> <li>Request for additional wording in <b>Policy IN1</b> regarding the approach to be taken in working with stakeholders to secure delivery of necessary mitigations, including reference also to further detail regarding phasing/delivery of mitigation schemes to be provided in an amended/updated Infrastructure Plan.</li> <li>Request for additional wording in <b>Policy IN1</b> regarding how CIL and planning obligations will be used to support delivery of necessary mitigations.</li> </ul>	<p><u>Policy IN1: Infrastructure Provision</u> Expressions of support are noted.</p> <p>Paragraph 8.11 of the Reasoned Justification to the Policy (Submission Document Reference: CBLP/01) includes commentary on the specific issue of Waste Water Treatment capacity, reflecting findings of the Water Cycle Study (Submission Document References: ES/SDC/09; ES/SDC/08a; and ES/SDC/08b).</p> <p>Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 7, includes a proposed hyperlink to Thames Water's pre-planning enquiry service.</p> <p>Changes to the Reasoned Justification wording and the Infrastructure Plan text suggested in the Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference CBLP/07) page 7, are considered to address the comments regarding the approaches to the delivery of infrastructure.</p> <p>As noted in the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a) and the Crawley Borough Council and West Sussex County Council Statement of Common Ground</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Request for change to wording of <b>Policy IN1</b> to provide further clarification regarding the approach to the delivery of necessary infrastructure.</li> <li>Comments regarding need for additional transport infrastructure to mitigate 'out of town' developments - including upgrade to Ifield Station, and appropriate cycling/walking routes.</li> <li>Comments regarding anticipated funding needs for additional General Practice capacity.</li> <li>Commentary regarding primary and secondary school capacity in Horley area.</li> </ul>	<p>(Submission Document Reference: SoCG/16) further work is being undertaken with West Sussex County Council and National Highways to provide further assurance regarding the deliverability of the transport mitigations identified in the Infrastructure Plan.</p>
<ul style="list-style-type: none"> <li>Recommendations that <b>Policy IN2</b> be made more explicitly supportive of expansion of specified forms of infrastructure and/or facilities, including waste water facilities and educational establishments.</li> <li>Recommendation that <b>Policy IN2</b> be worded to reflect need for new infrastructure to be located in accessible areas.</li> <li>Query as to whether waste water capacity constraints referred to in <b>Policy IN2</b> supporting text are compatible with proposed levels of housing growth.</li> <li>Recommended change to wording of supporting text of <b>Policy IN2</b> in respect of need for additional secondary education provision, to reflect latest evidence.</li> </ul>	<p><u>Policy IN2: The Location and Provision of New Infrastructure</u> CBC considers that the approach set out in Policy IN2 is adequate to provide sufficient support for necessary waste water or other infrastructure facilities, without more specific detail being required.</p> <p>The Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 7, includes a proposed modification to Policy IN2 to place greater weight on the need for new facilities which are widely accessed by the public to be accessible via public transport and/or active travel routes as well as an amendment to reflect the latest evidence regarding the need for secondary school provision.</p>
<p><u>Infrastructure Plan</u></p> <ul style="list-style-type: none"> <li>Expressions of support for the overall approach set out in <b>Policy IN1: Infrastructure Provision</b> and <b>Policy IN2: The Location and Provision of New Infrastructure</b>.</li> <li>Comments regarding need for engagement between the council, developers and Thames Water as the sewerage provider in respect of proposed developments.</li> <li>Recommendation that wording be included in <b>Policy IN1</b> regarding waste water infrastructure, including statement that occupation may be restricted by phasing condition where there are capacity constraints, and information regarding process for securing a sewerage connection.</li> <li>Request for additional wording in <b>Policy IN1</b> regarding the approach to be taken in working with stakeholders to secure delivery of necessary mitigations, including reference also to further detail regarding phasing/delivery of mitigation schemes to be provided in an amended/updated Infrastructure Plan.</li> <li>Request for additional wording in <b>Policy IN1</b> regarding how CIL and planning obligations will be used to support delivery of necessary mitigations.</li> </ul>	<p><u>Infrastructure Plan</u> Paragraph 8.11 of the Reasoned Justification to Policy IN1: Infrastructure Provision (Submission Document Reference: CBLP/01) includes commentary on the specific issue of Waste Water Treatment capacity, reflecting findings of the Water Cycle Study (Submission Document References: ES/SDC/09; ES/SDC/08a; and ES/SDC/08b).</p> <p>Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 7, includes a proposed hyperlink to Thames Water's pre-planning enquiry service.</p> <p>Changes to the Reasoned Justification wording and the Infrastructure Plan text suggested in the Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference CBLP/07) page 7, are considered to address the comments regarding the approaches to the delivery of infrastructure.</p> <p>As noted in the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a) and the Crawley Borough Council and West Sussex County Council Statement of Common Ground (Submission Document Reference: SoCG/16) further work is being undertaken with West Sussex</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>Request for change to wording of <b>Policy IN1</b> to provide further clarification regarding the approach to the delivery of necessary infrastructure.</li> <li>Comments regarding need for additional transport infrastructure to mitigate 'out of town' developments - including upgrade to Ifield Station, and appropriate cycling/walking routes.</li> <li>Comments regarding anticipated funding needs for additional General Practice capacity.</li> <li>Commentary regarding primary and secondary school capacity in Horley area.</li> <li>Recommendations that <b>Policy IN2</b> be made more explicitly supportive of expansion of specified forms of infrastructure and/or facilities, including waste water facilities and educational establishments</li> <li>Recommendation that <b>Policy IN2</b> be worded to as to reflect need for new infrastructure to be located in accessible areas.</li> <li>Query as to whether waste water capacity constraints referred to in <b>Policy IN2</b> supporting text are compatible with proposed levels of housing growth.</li> <li>WSCC recommended changes to wording of supporting text of <b>Policy IN2</b> in respect of need for additional secondary education provision, to reflect latest evidence. Homes England has also questioned the evidence to the educational need requirements and proposed modifications.</li> </ul>	<p>County Council and National Highways to provide further assurance regarding the deliverability of the transport mitigations identified in the Infrastructure Plan.</p> <p>CBC considers that the approach set out in Policy IN2 is adequate to provide sufficient support for necessary waste water or other infrastructure facilities, without more specific detail being required.</p> <p>The Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 7, includes a proposed modification to Policy IN2 to place greater weight on the need for new facilities which are widely accessed by the public to be accessible via public transport and/or active travel routes as well as an amendment to reflect the latest evidence regarding the need for secondary school provision.</p>
<p><b>Economic Growth &amp; Employment Land Trajectory</b></p> <p><i>Comments on this Chapter were received from 21 representors. These included a local resident, neighbouring local authorities and the county council, landowners and planning agents, businesses and specific interest groups: National Highways; Lamb Properties, the Dye Family and Elliott Metals/the Simmonds Family; Horsham District Council; Ardmore Ltd.; The Barker Trust; Gatwick Green Limited; Oxford Match Ltd.; Wealden District Council; Gatwick Airport Limited; Universities Superannuation Scheme Ltd.; West Sussex County Council; Homes England; Reigate and Banstead Borough Council; Mid Sussex District Council; Horley Town Council; Local Resident; BYM Capital; Manor Royal BID; Natural England; and HX Properties Ltd.</i></p> <p><i>Comments were received on the Employment Land Trajectory from one representor: Gatwick Green Limited.</i></p> <p><i>Comments were received on Chapter 9 generally as well as specific Policies EC1, EC2, EC3, EC4, EC5, EC7, EC9, EC11 and on the Employment Land Trajectory.</i></p>	
<p><u>General Chapter Comments:</u></p> <ul style="list-style-type: none"> <li>National Highways requested clarity as to whether employment numbers underpinning the Transport Study Report (2022) have changed in the most recent iteration of the Reg. 19 Local Plan.</li> </ul>	<p>The Local Plan employment figures have reduced slightly based on the 2022 Q4 Experian Baseline Job Growth projections. The updated transport model scenario testing tests impacts from employment needs based on the previous (2021) Regulation 19 Local Plan (Submission Document Reference: CBLP/04) figure, thereby allowing for a precautionary approach.</p>

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Main Issues	How this was taken into account?
<p><u>Policy EC1: Sustainable Economic Growth</u></p> <ul style="list-style-type: none"> <li>Site promoter objections to Policy EC1: Sustainable Economic Growth considered the Plan figure to under-estimate the employment land requirement. They principally considered the perceived shortfall to be an implication of failing to include uplift for significant levels of market demand for industrial and logistics. Wider factors also felt to have artificially suppressed the employment land requirement include (but are not limited to) pandemic economic impacts on forecasts, a perceived failure to account for net losses in employment land, and a lack of adjustments to account for growth lost due to historic land supply constraints.</li> <li>Gatwick Green Limited supported the proposed employment allocation but objected to Policy EC1 considering that it is not positively prepared given the absence of a market demand uplift to employment figures.</li> <li>Several representations provided additional market analysis, considering Crawley's employment needs for the Plan period to range between 48ha and 118h. Two representations put forward that a figure of 69ha most closely reflects Crawley's need with market demand factored in.</li> <li>Gatwick Airport Limited has objected to Policy EC1, considering it to conflict with national aviation policy, and arguing that the scale of Crawley's employment need is not sufficient to justify the proposed allocation. GAL advises that Crawley's employment needs should therefore be met elsewhere, potentially through Duty to Cooperate.</li> <li>Horsham District Council supported Policy EC1, subject to some modifications reflecting the status of its Local Plan progress. Wealden District Council supported the policy approach.</li> <li>BYM Capital support subsections i. ii. and iii of <b>Policy EC1</b> but believe that reference to "outside of safeguarding" should be removed.</li> </ul>	<p><u>Policy EC1: Sustainable Economic Growth: Critique of employment figures set out in the Local Plan</u></p> <p>The council's approach to identification of economic need is discussed in detail in Topic Paper 5: Employment Needs and Land Supply (Submission Document Reference: DS/TP/05).</p> <p>Section 4 summarises evidence from the Northern West Sussex Economic Growth Assessment 2020 (Submission Document Reference: EGSM/EG/07) and its Crawley focused updates 2020 (Submission Document Reference: EGSM/EG/06) and 2023 (Submission Document Reference: EGSM/EG/05).</p> <p>Topic Paper 5 section 5 discusses market evidence/signals relating to strategic industrial/logistics development.</p> <p><i>Approach to Safeguarding</i></p> <p>The approach regarding safeguarding is discussed in detail in Topic Paper 2; Gatwick Airport (Submission Document Reference: DS/TP/02), section 2.2 summarises the national policy context for safeguarding for a potential future southern runway at Gatwick Airport.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan evolved following the Initial Regulation 19 Consultation.</p> <p>Broad support outlined for the Policy EC1 approach is noted.</p>
<p><u>Policy EC2: Economic Growth in Main Employment Areas</u></p> <ul style="list-style-type: none"> <li>Gatwick Airport Limited objected to <b>Policy EC2: Economic Growth in Main Employment Areas</b>, suggesting alternative wording in relation to Lowfield Heath main employment area, to reflect its location within the GAT2 safeguarded land.</li> <li>Separately, one representation considered there should be greater flexibility to support residential uses in main employment areas, suggesting modified wording to this effect.</li> </ul>	<p><u>Policy EC2: Economic Growth in Main Employment Areas</u></p> <p>CBC is not proposing further modifications to Policy EC2.</p> <p>Supporting text at paragraph 9.39 already clarifies that Policy GAT2 applies at Lowfield Heath, rendering additional wording unnecessary.</p> <p>Supporting residential in main employment areas would be inconsistent with the overall Local Plan strategy given the already constrained employment land position.</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>BYM Capital support <b>Policy EC2</b> but suggest an additional criteria relating to alternative employment uses.</li> </ul>	<p>Feedback raised by BYM is already covered under i.) of Policy EC2.</p>
<p><u>Policy EC3: Manor Royal</u></p> <ul style="list-style-type: none"> <li>WSSC requested inclusion of the brick clay minerals consultation area on the Local Plan Map and reference to the West Sussex Joint Minerals Local Plan, 2018 (Partial Review 2021) and the West Sussex Waste Local Plan (2014) in the policy context.</li> <li>Homes England support the principles of <b>Policy EC3: Manor Royal</b> and welcome the policy direction that this business district should be enhanced through development. They support the reference in the supporting text <b>paragraph 9.46</b> that the Draft Crawley Local Plan should take a positive approach to the growth of the industrial area and promote the Rowley Farm site as a location for the expansion of Manor Royal to the north, if it were to be removed from the Gatwick Safeguarding Zone following a change in national aviation policy.</li> <li>BYM Capital support <b>Policy EC3: Manor Royal</b> but object to the reference to existing DPG and guidance.</li> <li>Manor Royal BID requests assurance of the protection of Manor Royal from Permitted Development residential conversions.</li> <li>Manor Royal BID supports reference to the Manor Royal business hub in the supporting text to <b>Policy EC3</b>.</li> </ul>	<p><u>Policy EC3: Manor Royal</u> WSSC comments are noted.</p> <p>Modifications made to Local Plan Map (Submission Document Reference: CBLP/M/01) and proposed new paragraph 2.56 to be added to Local Plan, as set out in Local Plan Schedule of Suggested Modifications July 2023 (Submission Document Reference: CBLP/07), pages 3 and 18-20. Concern has been addressed.</p> <p>Wider support for Policy EC3 approach is noted.</p> <p>Article 4 Directions fall outside of the Local Plan process but CBC has shown its commitment to supporting the business function of Manor Royal through existing and previous Article 4 Directions, consistent with the overall Plan strategy to support economic growth.</p> <p>No changes proposed to policy to remove reference to Manor Royal SPD.</p>
<p><u>Policy EC4: Strategic Employment Location</u></p> <ul style="list-style-type: none"> <li>Gatwick Green Limited (GGL) reiterated its support for the allocation (<b>Policy EC4: Strategic Employment Location</b>), considering this to clearly reflect the council's Local Plan vision, though GGL objected to the policy as drafted, suggesting policy modifications relating to the type/quantum of floorspace, transport matters, and delivery timeframes.</li> <li>Reigate &amp; Banstead Borough Council set out its support for <b>Policy EC4</b>.</li> <li>Natural England has outlined its support for the mitigations proposed within <b>Policy EC4</b>, though have suggested that specific wording is strengthened.</li> <li>Other site promoters have objected to the allocation, favouring instead sites they are respectively promoting, or have advised that their promoted sites should be allocated in addition to Gatwick Green given the scale of employment need:</li> <li>Vail Williams on behalf of the Ardmore Land Consortium considers its site to represent a natural extension to Manor Royal and therefore a more sustainable location. Its representation</li> </ul>	<p><u>Policy EC4: Strategic Employment Location</u> Support for Policy EC4 is noted.</p> <p>Modifications have been made to address some points raised, stating the need for a Construction Management &amp; Phasing Plan, and clarifications regarding aerodrome safeguarding and the anticipated build out period of the site. See Local Plan Schedule of Suggested Modifications July 2023 (Submission Document Reference: CBLP/07), pages 7-8.</p> <p>In relation to the critique of employment figures the council's approach to identification of economic need is discussed in detail in Topic Paper 5: Employment Needs and Land Supply (Submission Document Reference: DS/TP/05), section 4 summarises evidence from the Northern West Sussex Economic Growth Assessment 2020 (Submission Document Reference: EGSM/EG/07) and its Crawley focused updates 2020 (Submission Document Reference: EGSM/EG/06) and 2023 (Submission Document Reference: EGSM/EG/05).</p>

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Main Issues	How this was taken into account?
<p>considers Gatwick Green to conflict with various Local Plan policies.</p> <ul style="list-style-type: none"> <li>• Quod on behalf of the Barker Trust consider there to be flaws in the transport evidence that would render the Gatwick Green allocation undeliverable, promoting instead its Manor Royal Extension as an alternative allocation.</li> <li>• LRM Planning on behalf of WT Lamb Properties et al, support the Strategic employment Location allocation but consider a larger site, including their own land, is needed.</li> <li>• For the Gatwick Green allocation, and in relation to sites that are not proposed for allocation, submissions have been accompanied by supporting evidence considering (but not limited to) matters of landscaping/ecology, master planning, transport and drainage.</li> <li>• National Highways set out that <b>Policy EC4</b> should outline a clear vision and outcomes for sustainable transport solutions, for both the construction and operational phases.</li> <li>• Manor Royal BID requested stronger emphasis on the importance of promotion of Manor Royal in pursuing the Strategic Site Allocation.</li> <li>• Both Mid Sussex District Council and Horley Town Council have continued to raise concerns relating to transport impacts.</li> <li>• One further resident objection was received.</li> </ul>	<p><i>Airport Safeguarding</i> The approach regarding safeguarding is discussed in detail in Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02). Section 2.2 summarises the national policy context for safeguarding for a potential future southern runway at Gatwick Airport.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan evolved following the Initial Regulation 19 Consultation.</p> <p><i>Transport impacts</i> Comments are noted.</p> <p>The transport modelling evidence base has been updated with Sensitivity tests, one of which takes account of the potential expansion of the airport (Submission Document Reference: ES/ST/01a &amp; ES/ST/01w).</p> <p>Statements of Common Ground have been agreed with National Highways (Submission Document Reference: SoCG/15a) and WSCC (Submission Document Reference: SoCG/16) respectively. These set out points of agreement and areas where further clarification is required – this work is ongoing.</p>
<p><u>Policy EC5: Employment and Skills Development</u></p> <ul style="list-style-type: none"> <li>• Support was expressed for the approach of <b>Policy EC5: Employment and Skills Development</b>, though modifications have been suggested to provide greater policy flexibility.</li> </ul>	<p><u>Policy EC5: Employment and Skills Development</u> Support is noted.</p> <p>Text has been added to Policy IN1 supporting text (paragraphs 8.8 and 8.9) to further clarify approach. See Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) pages 6-7.</p>
<p><u>Policy EC7: Hotel and Visitor Accommodation</u></p> <ul style="list-style-type: none"> <li>• Gatwick Airport Limited reiterated its support for the approach of <b>Policy EC7: Hotel and Visitor Accommodation</b>.</li> <li>• Holiday Extras has objected to <b>Policy EC7</b>, arguing that the sequential test should continue to be applied to hotel and visitor accommodation, and considering there to be inconsistency of approach between on and off-airport hotels with regards to airport-related parking.</li> </ul>	<p><u>Policy EC7: Hotel and Visitor Accommodation</u> Support for Policy EC7 approach is noted.</p> <p>Disagree with comment objecting to sequential test removal - accept this is not covered in national policy but given particular circumstance of an international airport within the borough, consider the airport boundary an appropriate and sustainable location for hotel accommodation, which is predominantly for airport passengers and staff, and it is therefore unnecessary to require the sequential test. No further modifications are suggested in relation to this policy.</p>
<p><u>Policy EC9: Supporting the Creative Industries</u></p> <ul style="list-style-type: none"> <li>• Manor Royal BID requested more information regarding <b>Policy EC9: Supporting the Creative Industries</b>.</li> </ul>	<p><u>Policy EC9: Supporting the Creative Industries</u> Support is noted.</p>

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<p><u>Policy EC11: Employment Development and Amenity Sensitive Uses</u></p> <ul style="list-style-type: none"> <li>Manor Royal BID request clarification regarding <b>Policy EC11: Employment Development and Amenity Sensitive Uses.</b></li> </ul>	<p><u>Policy EC11: Employment Development and Amenity Sensitive Uses</u></p> <p>Support is noted.</p>
<p><u>Employment Land Trajectory</u></p> <p>Gatwick Green Limited reiterated points raised under <b>EC1</b> and <b>EC4</b> (quantum of allocation land/floorspace and delivery timeframes) in relation to the Employment Land Trajectory, suggesting modifications that would in its view ensure the ELT is sound.</p>	<p><u>Employment Land Trajectory</u></p> <p>The council's approach to identification of economic need is discussed in detail in Topic Paper 5: Employment Needs and Land Supply (Submission Document Reference: DS/TP/05).</p> <p>Section 4 summarises evidence from the Northern West Sussex Economic Growth Assessment 2020 (Submission Document Reference: EGSM/EG/07) and its Crawley focused updates 2020 (Submission Document Reference: EGSM/EG/06) and 2023 (Submission Document Reference: EGSM/EG/05).</p> <p>Topic Paper 5 section 5 discusses market evidence/signals relating to strategic industrial/logistics development.</p>
<p><b>Gatwick Airport</b></p> <p><i>Comments on this Chapter were received from 20 representors. These included a national government agency, the county council, infrastructure provider, neighbouring authorities, landowners and planning agents, businesses and specific interest groups: West Sussex County Council; Save West of Ifield Campaign; National Highways; Horsham District Council; Gatwick Airport Limited; Natural England; Thames Water; Lamb Properties, the Dye Family and Elliott Metals/the Simmonds Family; Ardmore Ltd.; Homes England; The Barker Trust; Gatwick Green Limited; Sussex Wildlife Trust; Woodland Trust; Arora Management Services; BYM Capital; Panattoni UK; AITUP; Manor Royal BID; and HX Properties Ltd.</i></p> <p><i>Comments were received on the Gatwick Airport Runway Project DCO as well as specific Policies GAT1, GAT2, GAT3 and GAT4.</i></p>	
<p><u>Policy GAT1: Development of the Airport with a Single Runway</u></p> <ul style="list-style-type: none"> <li>WSCC and National Highways request consideration of the potential cumulative impacts on the transport network from the forecast airport growth and the Local Plan.</li> <li>Given the uncertainties relating to aviation, assumptions on airport growth are queried and updates to passenger figures are requested. Impacts of airport growth on housing demand and the need to diversify the economy should be reflected in the Plan.</li> <li>The Save West of Ifield Campaign suggests the potential noise impacts on residents in the potential West of Ifield development should be recognised.</li> <li>Horsham DC supports the principle of <b>Policy GAT1: Development of the Airport with a Single Runway</b> but seeks inclusion of references to cumulative impacts,</li> <li>GAL objects to the description of Gatwick Airport as a single runway, two terminal airport in <b>Policy GAT1</b>. It objects to all the amendments to Criterion ii) arguing the revised</li> </ul>	<p><u>Policy GAT1: Development of the Airport with a Single Runway</u></p> <p>The transport modelling evidence base has been updated with Sensitivity tests, one of which takes account of the potential expansion of the airport (Submission Document Reference: ES/ST/01a &amp; ES/ST/01w).</p> <p>Statements of Common Ground have been agreed with National Highways (Submission Document Reference: SoCG/15a) and WSCC (Submission Document Reference: SoCG/16) confirming appropriate sensitivity tests have been undertaken to an agreed methodology and conclude that the Transport Modelling Study continues to represent an appropriate assessment of future transport conditions at the end of the Local Plan period in 2040.</p> <p>The suggested Modification to paragraph 10.11 of the Local Plan sets out updated passenger figures relating to the airport (Local Plan Schedule of Suggested Modifications, July 2023, Submission Document Reference: CBLP/07).</p>

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<p>“balance” assessment fails to give weight to the positive benefits of airport growth, and should not reference compensation. GAL supports the new criterion iii) subject to the reference to compensation being deleted.</p> <ul style="list-style-type: none"> <li>Natural England supports <b>Criteria ii and iii of Policy GAT1</b> but recommends detailed wording changes regarding the mitigation hierarchy and compensation.</li> <li>Manor Royal BID is supportive of growth at Gatwick Airport as a single runway, two terminal airport and growth within its existing footprint, subject to a number of concerns.</li> </ul>	<p><i>Impacts of airport growth on housing demand and the need to diversify the economy should be reflected in the Plan.</i></p> <p>The Housing figure identified in the Local Plan is a supply led figure due to constraints of the borough.</p> <p>Topic Paper 5: Employment Needs and Land Supply (Submission Document Reference: DS/TP/05) recognises the need to diversify the economy.</p> <p>Concerns from the Manor Royal BID regarding the employment land supply impacts of safeguarding are noted. The council has set out its reasons for retaining safeguarding in Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02), section 2.2 summarises the national policy context for safeguarding for a potential future southern runway at Gatwick Airport.</p> <p>Section 3.4 explains the history and impact of safeguarding on the borough, including how the safeguarding policy in the Submission Local Plan evolved following the Initial Local Plan Regulation 19 Consultation, 2020 (Submission Document Reference: CBLP/05).</p> <p>West of Ifield is beyond the borough boundary and the Local Plan cannot establish policies outside the borough.</p> <p>Topic Paper 2, section 3.2 sets out the council’s consideration of matters raised in representations relating to Policy GAT1. The requirement for compensation is intended to relate to several forms of compensation, including habitats and community compensation and is based on NPPF paragraph 180(c) and the Airports National Policy Statement (ANPS), 2018, which is an “<i>important and relevant consideration in respect of applications for new runway capacity and other airport infrastructure in London and the South East of England</i>” (paragraph 1.12, ANPS, 2018). Natural England’s proposed amendment of “like for like compensation” in Policy GAT1, criterion iii, to “fair compensation” would be supported by the council as a Modification to the Crawley Borough Local Plan.</p>
<p><u>Policy GAT2: Safeguarded Land</u></p> <ul style="list-style-type: none"> <li>Thames Water supports the deletion of the Gatwick Airport Safeguarded Land Policy (<b>Policy GAT2: Safeguarded Land</b>).</li> <li>WSCC recognises the technical work completed on the Crawley Western Link Road and withdraw their objection to <b>Policy GAT2</b> and <b>Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link</b>. HDC also supports the policy.</li> <li>Homes England recognise the national policy drivers for the continued safeguarding area</li> </ul>	<p><u>Policy GAT2: Safeguarded Land</u></p> <p>Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02), section 2.2 summarises the national policy context for safeguarding for a potential future southern runway, and section 3.4 explains the history and reason for continued safeguarding.</p> <p>Topic Paper 2, section 3.5 explains the rationale for the allocation of the Gatwick Green strategic employment site within the safeguarded area. This is further explained in Topic Paper 5: Employment</p>

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<p>proposed for the potential southern runway of Gatwick Airport and support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within <b>Policy ST4</b>, with reference and support for the text of <b>paragraph 17.29</b>.</p> <ul style="list-style-type: none"> <li>Homes England supports the wording within supporting text <b>paragraph 10.18</b> for the trigger of a Local Plan Review should a change in National Aviation Policy come forward and we will welcome engagement in any future Local Plan Review. However, in the interim, believe that should safeguarding fall away <b>Policy CL8</b> should be applied to the Rowley Farm site.</li> <li>Landowners in the remaining safeguarded area continue to object to the retention of safeguarding and sterilisation of potential employment sites which could support the diversification of the economy and support the core business function of Manor Royal. One argues that the SA fails to robustly address opportunities to maximise effective use of land or the extent of safeguarding required, rather it prioritises airport growth. Landowners argue safeguarding is based on uncertainty and outdated national policy without robust evidence, and that the government decision to support expansion at Heathrow and the Gatwick Airport Northern Runway proposal remove the need to safeguard land for a further southern runway at Gatwick. Landowners argue reliance on the Masterplan boundary for safeguarding (which now extends further south than the adopted 2015 Local Plan) is not justified, is inappropriate because it is materially different to current proposals for the Northern Runway and is inconsistently applied to unjustifiably exclude the Gatwick Green allocation and land for the Crawley Western Multi-Modal Link. Some landowners argue the remaining safeguarded land east of Balcombe Road could have no role in the delivery of a southern runway and should not be safeguarded. Landowners propose wording changes in the policy or text to allow for temporary uses, and the redevelopment/replacement of existing sites in the safeguarded area.</li> <li>Gatwick Green Ltd supports the Strategic Employment Site being removed from the extent of safeguarding and provides evidence, particularly related to car parking provision and highway requirements, to demonstrate the Masterplan safeguarding boundary is not robustly evidenced, and that Gatwick Green</li> </ul>	<p>Needs and Land Supply (Submission Document Reference: DS/TP/05), sections 4 and 6.</p> <p>The interpretation of small-scale development is explained in paragraph 10.19 of the Local Plan. This paragraph also explains what incompatible development would be, which is likely to include the redevelopment of existing commercial sites. The council welcomes GAL's confirmation that they do not object to the approval of temporary uses which do not prejudice the future delivery of a second runway. Given the cautious approach which has been taken in the past by GAL, defining criteria for "temporary" will be important which the council will explore with GAL.</p> <p>Topic Paper 2, section 3.6 summarises the work undertaken on the Crawley Western Multi-Modal Transport Link and the Systra Study Evidence (Submission Document Reference: ES/ST/02a-m) sets out the options considered and the reason a possible interim option is shown.</p> <p>The requirement to safeguard is a national policy requirement and the impact of potential future airport expansion on ancient woodland would be considered through the Development Consent Order process.</p>

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<p>can be delivered in a manner that is compatible with the future development of a southern runway. Additional text is proposed for <b>Policy GAT2</b> to enable more efficient joint access proposals to be provided.</p> <ul style="list-style-type: none"> <li>• GAL continues to support the principle of <b>GAT2</b> but considers wording from the 2021 version of the Policy should be reinstated to clarify the definition of “small scale” development, and to confirm that GAL does not object to temporary uses which do not prejudice the future delivery of a southern runway. GAL continues to object to the loss of safeguarded of land for the Gatwick Green Strategic Employment allocation and the potential loss for the Crawley Western Relief Road.</li> <li>• The Sussex Wildlife Trust does not support the expansion of the airport and the impact on biodiversity assets. Together with the Woodland Trust, it lists ancient woodlands which should be excluded from the safeguarded area.</li> <li>• One respondent put forward that redevelopment of existing commercial sites and temporary uses should be allowed within the safeguarded land (representation made against the Local Plan Map).</li> </ul>	
<p><u>Policy GAT3: Gatwick Airport Related Parking</u></p> <ul style="list-style-type: none"> <li>• National Highways argue airport parking proposals outside the airport boundary should be accompanied by a detailed Transport Assessment and suggest the passenger mode share targets should reflect the latest targets in the Airport Transport Assessment.</li> <li>• Support was received from GAL and HDC to <b>Policy GAT3: Gatwick Airport Related Parking</b>.</li> <li>• HX Properties Ltd objections were received to <b>Policy GAT3</b>, primarily on the grounds it is ineffective due to GAL’s permitted development rights (unless these are removed through an Article 4), GAL’s role in the provision of parking, and the restriction of competition. Suggestions are made regarding data sources, mode share targets and the importance of the involvement of off-airport parking providers in the surface transport discussions.</li> <li>• The Woodland Trust argued that no areas of ancient woodland should be used for car parking which is not a “wholly exceptional” use.</li> </ul>	<p><u>Policy GAT3: Gatwick Airport Related Parking</u> Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02), section 3.7 explains the rationale and background to Policy GAT3, including Local Plan and appeal Inspectors’ decisions and the High Court judgement, and the relationship between Policy GAT3 and the Gatwick Airport s106 (Submission Document Reference: EGSM/GA/05) and the Surface Access Strategy (Submission Document Reference: EGSM/GA/09).</p>
<p><u>Policy GAT4: Employment Uses at Gatwick</u></p> <ul style="list-style-type: none"> <li>• GAL continues to support <b>Policy GAT4: Employment Uses at Gatwick</b>, as does the owner of Viking House but they argue the policy should be amended to allow for more immediate employment needs rather than being</li> </ul>	<p><u>Policy GAT4: Employment Uses at Gatwick</u> Topic Paper 2: Gatwick Airport (Submission Document Reference: DS/TP/02), section 3.8 explains the council’s approach to employment uses at Gatwick, especially non-airport related uses.</p>

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<p>predicated upon long term anticipated airport growth needs.</p>	
<p><b>Crawley Town Centre</b>  <i>Comments on this Chapter were received from five representors. These included a neighbouring local authority, developers, landowners, businesses and infrastructure providers: 90 North Group Limited; Horsham District Council; Chichester College Group; Network Rail; and DT Last Mile Retail (Crawley) Unit Trust.</i></p> <p><i>Comments were received on Policies TC1, TC2, TC3, and TC5.</i></p>	
<p><u>Policy TC1: Primary Shopping Area &amp; Policy TC2: Town Centre Neighbourhood Facilities</u></p> <ul style="list-style-type: none"> <li>A modification to <b>Policies TC1: Primary Shopping Area</b> and <b>TC2: Town Centre Neighbourhood Facilities</b> was suggested, seeking to allocate a specific town centre site for education use.</li> </ul>	<p><u>Policy TC1: Primary Shopping Area &amp; Policy TC2: Town Centre Neighbourhood Facilities</u></p> <p>The suggested modification is not considered necessary, as the approach of Submission Local Plan Policies TC1 and TC2 is sufficiently flexible to support education use should proposals and/or a planning application come forward.</p>
<p><u>Policy TC3: Development Sites within the Town Centre Boundary</u></p> <ul style="list-style-type: none"> <li>Horsham District Council supported the approach of <b>Policy TC3: Development Sites within the Town Centre Boundary</b>, welcoming the increased target for residential net completions across the Town Centre Opportunity Sites. HDC requested that the SHLAA provide further detail as to how residential capacities have been identified and demonstrate that site potential has been maximised.</li> <li>Specific comments were submitted in relation to identified Town Centre Opportunity Sites, cross referencing to <b>Policies H2 and IN1</b>.</li> </ul>	<p><u>Policy TC3: Development Sites within the Town Centre Boundary</u></p> <p>Support is noted.</p> <p>The approach to maximising site potential is set out in the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01) and Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04). These documents provide context for the Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04).</p>
<p><u>Policy TC5: Town Centre First</u></p> <ul style="list-style-type: none"> <li>An objection was received in relation to the tighter impact test trigger of 500sqm, considering this to go some way beyond the 2,500sqm threshold identified in the NPPF.</li> </ul>	<p><u>Policy TC5: Town Centre First</u></p> <p>Objection is noted.</p> <p>CBC is not proposing any modifications to Policy TC5 at this time.</p>
<p><b>Housing Delivery, Strategic Housing Land Availability Assessment &amp; Housing Trajectory</b>  <i>Comments on this Chapter were received from 39 representors. These included 13 local residents, six neighbouring authorities and parish councils and a county council, infrastructure providers, national government agencies, developers, landowners and businesses, and specific interest groups: National Highways; Sussex Wildlife Trust; Horsham District Council; Mid Sussex District Council; A2 Dominion; Save West of Ifield Campaign; Gladman Developments; Reigate and Banstead Borough Council; Persimmon Homes; Home Builders Federation; CPRE Sussex; Wealden District Council; Chichester District Council; Wates; Network Rail; Slaugham Parish Council; Thames Water; Homes England; Bellway Homes; Woodland Trust; Environment Agency; Natural England; The Bucknall Family; Invia Group; Surrey County Council; and Gatwick Airport Limited.</i></p> <p><i>Comments were received on the Chapter’s introductory text, including the Urban Extensions section (paragraphs 12.17-12.23) and unmet housing need as well as Policies H1, H2, H3, H3a, H3b, H3c, H3d, H3e and H3f.</i></p>	
<p><u>Housing Need (Policy H1)</u></p> <ul style="list-style-type: none"> <li>Claim that the Strategic Housing Market Assessment (2019) needs updating in order to justify the Housing Need figure in <b>Policy H1: Housing Provision</b>.</li> </ul>	<p><u>Policy H1: Housing Provision</u></p> <p>CBC considers that the Northern West Sussex Strategic Housing Market Assessment (Submission Document Reference: H/HN/01) when combined with updated Standard Method inputs and when</p>

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<ul style="list-style-type: none"> <li>• Claim that the housing need figure in <b>Policy H1</b> should be amended to take account of capacity of neighbouring authorities to accommodate Crawley's unmet need.</li> <li>• Concern that the approach outlined in <b>Policy H1</b> in terms of unmet need is not supported by an up to date Statement of Common Ground with other/neighbouring authorities.</li> <li>• Concern that strategy in <b>Policy H1</b> of only meeting 42% of identified housing need and leaving the rest as unmet need in the expectation that this can be met by neighbouring authorities is not sufficiently justified, given the strain on infrastructure (including the rail network), and the impact of environmental and water neutrality constraints.</li> <li>• Request for further work to produce a joint evidence base, including a SHLAA, for the Housing Market Area in order to support the approach detailed in <b>Policy H1</b>.</li> <li>• The Save West of Ifield Campaign raised queries in relation to both housing need and housing supply (particularly estate regeneration and densification) evidence.</li> <li>• General comments about the approach taken in terms of the assessment of housing need, the identification of the proposed housing supply, and the discussion of unmet need.</li> <li>• General comments and information on the processes taken by neighbouring LPAs and areas in calculating and responding to identified housing need, and the constraints affecting them.</li> <li>• Concern that the housing supply figure in <b>Policy H1</b> is not robust given lack of demonstrated progress with the water neutrality offsetting scheme.</li> <li>• Request for confirmation that housing growth currently proposed (especially unconsented growth) is similar to the expectations which informed the Transport Study.</li> <li>• Query as to whether housing target should be reconsidered in light of Written Ministerial Statement of December 2022.</li> <li>• Concern that the evidence base supporting <b>Policy H1</b> (especially the Compact Development Study) does not fully demonstrate that available land has been optimised in terms of housing delivery capacity.</li> <li>• Query as to why no further work appears to have been undertaken in respect of estate regeneration opportunities as part of the site selection process, notwithstanding the inclusion of <b>Policy H3a: Estate Regeneration</b>.</li> <li>• Request that additional land parcels being promoted within the Forge Wood</li> </ul>	<p>considered alongside evidence of housing provision in recent years, as set out in Crawley Local Plan Authority Monitoring Report 1 April 2020 – 31 March 2021 (Submission Document Reference: CB/AMR/02) remains an appropriate basis for the assessment of housing need and demand.</p> <p>The Submission Policy H1: Housing Provision (Submission Document Reference: CBLP/01) includes a calculation of need in accordance with the Standard Method using a base year of 2023 and the 2022 median affordability ration published in March 2023.</p> <p>The approach to engagement with neighbouring authorities in respect of Crawley's unmet housing need and the outcomes of this are set out in the Duty to Cooperate Statement, July 2023 (Submission Document Reference: KD/DtC/01) and the Northern West Sussex Housing Needs Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/02).</p> <p>The proposed housing requirement reflects the borough's limited supply of land and existing constraints. Further detail is provided in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04), while the Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the methodology for assessing sites and individual site assessments.</p> <p>As noted above in response to the issues raised in relation to Chapter 4, the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01), and Submission Local Plan Policies CL2-CL5 (Submission Document Reference: CBLP/01) set out a clear explanation of the methodology for determining and demonstrating that available land has been optimised in terms of housing delivery capacity.</p> <p>The Crawley Transport Modelling Study (Submission Document Reference: ES/ST/01a) was published in 2021, updated in June 2022 and is now supported by the Crawley Transport Modelling Study TN02 GAL Sensitivity Test, June 2023 and Crawley Transport Modelling Study TN03 Gatwick Green Trip Generation Comparison, June 2023 (Submission Document Reference: ES/ST/01w). Work with National Highways and West Sussex County Council is reflected in the Northern West Sussex Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/01); the Crawley Borough Council and National Highways Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/15a); and</p>

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<p>neighbourhood be identified as part of the borough's housing land supply.</p> <ul style="list-style-type: none"> <li>Concern that mitigation of impacts on level crossings may need to be funded and implemented by developers. Risk assessment should be undertaken for specific applications to determine impact.</li> </ul>	<p>the Crawley Borough Council and West Sussex County Council Statement of Common Ground (Submission Document Reference: SoCG/16).</p> <p>Expressions of support are noted.</p> <p>Policy H1: Housing Provision identifies areas to the north of Langley Green and Forge Wood as areas of search for residential development, as reflected in the Local Plan Key Diagram (page 17, Submission Document Reference: CBLP/01).</p>
<p><u>Development outside Crawley's Boundaries</u></p> <ul style="list-style-type: none"> <li>Support for recognition that urban extensions may be appropriate, with suggestions of how these could be implemented in a way that accords with the proposed Crawley Local Plan review approach.</li> <li>Recommendation that <b>paragraph 12.23</b> should be worded more strongly to make Crawley Borough Council support for extensions conditional on requirements being met.</li> <li>Homes England consider it is appropriate for Crawley Borough Council to set out its considerations for urban extensions through supporting text, but suggest some modifications to some of the criteria set out in <b>paragraph 12.23</b>.</li> <li>Concern that <b>paragraphs 12.17-12.23</b> relate to areas outside Crawley's administrative area and include a 'shadow' policy. This section should be removed as it is not effective. Also concern regarding apparent expectation that urban extensions will meet need arising from Crawley.</li> <li>Concern that <b>paragraph 12.39</b> (part of the Reasoned Justification of <b>Policy H1</b>) does not recognise the difficulties Horsham District Council has in meeting its own need and should be amended.</li> <li>Query as to whether the Local Plan is consistent with installation of cycle/pedestrian paths across Ifield Brook Meadows to provide links to the proposed West of Ifield site. Appropriate cycle routes should be in place across Ifield and adjacent areas before development takes place.</li> <li>Concern that western multi-modal link road should be implemented ahead of West of Ifield but it does not seem plausible given the constraints so there is risk of the traffic affecting existing roads within the borough.</li> </ul>	<p>CBC consider that the Submission Local Plan paragraph 12.23 (Submission Document Reference: CBLP/01) represents an appropriate statement of the council's approach to engaging with strategic development proposals 'at Crawley' following the removal of earlier draft Policy H3g (Submission Document Reference: CBLP/05).</p>
<p><u>Site Allocations (Policy H2)</u></p> <ul style="list-style-type: none"> <li>Request that additional land parcels being promoted within the Forge Wood neighbourhood be identified as part of the borough's housing land supply and included in <b>Policy H2: Key Housing Sites</b>.</li> </ul>	<p><u>Policy H2: Key Housing Sites</u></p> <p>The Crawley Strategic Housing Land Availability Assessment, February 2023 (Submission Document Reference: H/HD/04) sets out the</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Recommendation that <b>Policy H2</b> should make reference to any site specific sewerage/wastewater infrastructure concerns. Forge Wood Phase 4B and Gatwick Green are likely to require upgrades to the wastewater network and the developers/LPA should liaise with Thames Water regarding this.</li> <li>• Concern that sites proposed for allocation in <b>Policy H2</b> falling within the Sussex North Water Resource Zone should only be permitted on a 'water neutral' basis.</li> <li>• Support for the approach taken by <b>Policy H2</b> in respect of treatment of flood risk.</li> <li>• For consistency with Department for Transport Circular 1/2022, <b>Policy H2</b> should require preparation of a vision for each site reflecting community input, supporting sustainable transport, and reducing the need to reduce travel, especially by car. This can be supported through layout and design.</li> <li>• Further evidence is required to show how the capacities of residential sites in <b>Policy H2</b> have been optimised and to thereby justify the overall number of dwellings proposed. This should be more clearly reflected in the SHLAA.</li> <li>• Support for allocation in <b>Policy H2</b> of <b>Land Adjacent to Sutherland House</b>, which could come forward sooner and with a larger dwelling quantum than indicated in the Local Plan/SHLAA/housing trajectory. The site should be considered as 'deliverable' and part of the 5-year housing land supply.</li> <li>• Request that the inclusion of the <b>car park at Crawley Station</b> within the <b>Town Centre Key Opportunity Sites</b> allocation in <b>Policy H2</b>, and any resulting loss of parking provision, will not negatively impact on the accessibility of the station for those who need to travel by car. Request that where new development is proposed close to the station (within the Town Centre Opportunity Site) the council should consider securing improvements to the station to accommodate increased use.</li> <li>• Concern that the proposed requirement in <b>Policy H2</b> for the <b>Tinsley Lane Playing Fields 'Housing and Open space' site</b> to provide allotments would jeopardise the delivery of the site, and should be removed/changed.</li> <li>• Support for elements of <b>Tinsley Lane Playing Fields allocation</b> in <b>Policy H2</b> which require minimisation of potential conflicts with the function of the adjacent goods yard (a safeguarded minerals site). Inclusion of goods yard minerals site on the Local Plan map is also supported.</li> </ul>	<p>methodology for assessing sites and individual site assessments.</p> <p>Policy H1: Housing Provision identifies areas to the north of Langley Green and Forge Wood as areas of search for residential development, as reflected in the Local Plan Key Diagram (page 17, Submission Document Reference: CBLP/01).</p> <p>Paragraph 8.11 of the Reasoned Justification to Policy IN1: Infrastructure Provision (Submission Document Reference: CBLP/01) includes commentary on the specific issue of Waste Water Treatment capacity, reflecting findings of the Water Cycle Study (Submission Document References: ES/SDC/09; ES/SDC/08a; and ES/SDC/08b) and advises early consultation with Thames Water.</p> <p>Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 7, includes a proposed hyperlink to Thames Water's pre-planning enquiry service.</p> <p>The need for larger residential sites to set out a vision for movement (in accordance with Circular 01/2022) is set out in Policy ST1: Development and Requirements for Sustainable Transport as well as Policies CL2: Making Successful Places – Principles of Good Urban Design; CL3: Movement Patterns, Layout and Sustainable Design; CL4: Compact Development – Layout, Scale and Appearance; and CL5: Significant Development, Masterplanning and Design Success.</p> <p>The Reasoned Justification of Policy H2, paragraph 12.47 (Submission Document Reference: CBLP/01) states that the dwelling totals given are (except for the case of Land East of Street Hill, Worth) indicative figures which could be exceeded subject to a policy compliant scheme. The text is also clear that sites identified as 'developable' could potentially come forward sooner than years 6-16 of the Plan.</p> <p>A number of the sites proposed for allocation which are subject to representations are allocated in the existing adopted Local Plan: Crawley 2030, December 2015 (Submission Document Reference: CBLP/02) including Land East of Street Hill, Worth and Tinsley Lane Playing Fields, Three Bridges (the latter of which is also subject to an adopted Development Brief).</p> <p>The status of Steers Lane Phase 2 in relation to the Submission Local Plan is further explained in Appendix B of Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04).</p>

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Main Issues	How this was taken into account?
<ul style="list-style-type: none"> <li>• Objections to proposed allocation of <b>Tinsley Lane Playing Fields</b> in <b>Policy H2</b> as a <b>‘Housing and Open Space’ site</b> on grounds of highways impact/road safety, loss of sport/recreation facilities, lack of provision of community services/facilities, loss of verges on Birch Lea, biodiversity impact, air quality impact, impact on existing character, loss of trees, noise, water neutrality constraints, land contamination, impact on amenity of existing residents, lack of consideration of access needs of users, inability to meet service/operational requirements (e.g. parking, servicing, waste collection), and unsuitable design/layout of proposed plan. Requests that the land should be designated for recreational/sports use in order to meet need for such spaces and facilities.</li> <li>• Confirmation that the <b>‘Housing, Biodiversity and Heritage site’</b> at <b>Land East of Street Hill</b> is suitable, available and achievable, subject to adoption of a Development Brief, and the allocation in <b>Policy H2</b> is supported in principle. However, a proposed change to one of the allocation criteria, relating to grassland, is not supported as it would not be effective or consistent with national policy.</li> <li>• Objection to allocation of <b>‘Housing, Biodiversity and Heritage site’</b> at <b>Land East of Street Hill</b> owing to ecological sensitivity of the site as a Local Wildlife Site and its role within wider ecological networks</li> <li>• Request that the reference to the <b>Steers Lane</b> site in <b>Policy H2</b> should be changed to take account of Phase 2 and the additional dwellings expected to be delivered there.</li> <li>• Support for identification of <b>138-144 London Road</b> as a <b>Broad Location</b> in <b>Policy H2</b> as a means of maximising use of an under-occupied site in an accessible location.</li> <li>• Emphasis that housing allocations in proximity to ancient woodland and/or veteran trees should ensure that impacts on these habitats are avoided and enhancements are supported.</li> <li>• Objection to allocation for housing development of sites that include areas of ancient semi-natural woodlands.</li> <li>• Other comments acknowledging terms of the policy in relation to particular sites.</li> </ul>	
<p><u>Housing Typologies (Policies H3, H3a-f)</u></p> <ul style="list-style-type: none"> <li>• General support for the ‘Housing Typology’ policies <b>H3 &amp; H3a-H3f</b> as striking an appropriate balance between constraints and the imperative to address housing needs as far as possible, although concern is expressed that <b>Policy H3a: Estate Regeneration</b> is not</li> </ul>	<p><u>Policy H3: Housing Typologies</u>                      Policy H3 and the associated Policies H3a-H3f seek to set out as far as possible how different types of opportunities for additional development within the Built-Up Area will be approached. The council’s approach to making effective use of land in order to maximise the potential for delivery of residential</p>

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Main Issues	How this was taken into account?
<p>justified or optimally effective given apparent lack of progress in identifying estate regeneration opportunities. Also, query as to why recognition of the need to plan for suitable waste and recycling storage within these policies is not accompanied by requirements in respect of treatment of waste associated with development activity.</p> <ul style="list-style-type: none"> <li>Surrey County Council support housing <b>Policies H3c and H3e</b> for previous noted reason.</li> </ul>	<p>development while respecting site constraints is explained in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04) and the Crawley Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01) – an earlier version of which was titled 'Densification Study' and published alongside the 2021 Local Plan Regulation 19 Consultation.</p> <p>The rationale of the proposed windfall allowance, largely based on expectations for additional development sites within the Built-Up Area Boundary, is set out in the Windfall Statement, May 2023 (Submission Document Reference: H/HN/06).</p> <p>The issue of waste associated with the development process is addressed by Policy SDC1: Sustainable Design &amp; Construction.</p>
<p><u>Strategic Housing Land Availability Assessment</u></p> <ul style="list-style-type: none"> <li>Request for further work to produce a joint evidence base, including a SHLAA, for the Housing Market Area in order to support the approach detailed in <b>Policy H1</b>.</li> <li>Further evidence is required to show how the capacities of residential sites in <b>Policy H2: Key Housing Sites</b> have been optimised and to thereby justify the overall number of dwellings proposed. This should be more clearly reflected in the SHLAA.</li> <li>Approach to considering suitability of residential sites from the perspective of flood risk is broadly supported.</li> <li>Support for allocation of <b>Land Adjacent to Sutherland House</b>, which could come forward sooner and with a larger dwelling quantum than indicated in the Local Plan/SHLAA/housing trajectory. The site should be considered as 'deliverable' and part of the 5-year housing land supply.</li> <li>Objections that <b>Tinsley Lane Playing Fields Site</b> is unsuitable for housing development on grounds of highways impact/road safety, loss of sport/recreation facilities, lack of provision of community services/facilities, loss of verges on Birch Lea, biodiversity impact, air quality impact, impact on existing character, loss of trees, noise, water neutrality constraints, land contamination, impact on amenity of existing residents, lack of consideration of access needs of users, inability to meet service/operational requirements (e.g. parking, servicing, waste collection), and unsuitable design/layout of proposed plan.</li> <li>If allocated, <b>Tinsley Lane Playing Fields</b> should go ahead with a lower dwelling quantum</li> </ul>	<p><u>Strategic Housing Land Availability Assessment</u></p> <p>As noted earlier in response to Chapter 4 representations, the capacities of residential sites included in the Strategic Housing Land Availability Assessment (SHLAA), February 2023 (Submission Document Reference: H/HD/04) is documented in in Chapter 6 of the Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01), along with an explanation of the methodology used and how the Assessment is policy compliant.</p>

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Main Issues	How this was taken into account?
<p>to allow Oakwood Football club to meet its needs.</p> <ul style="list-style-type: none"> <li>• Confirmation that the '<b>Housing, Biodiversity and Heritage site</b>' at <b>Land East of Street Hill</b> is suitable, available and achievable, subject to adoption of a Development Brief.</li> <li>• Objection to allocation of '<b>Housing, Biodiversity and Heritage site</b>' at <b>Land East of Street Hill</b> owing to ecological sensitivity of the site as a Local Wildlife Site and its role within wider ecological networks.</li> <li>• Request that additional land parcels being promoted within the <b>Forge Wood</b> neighbourhood be identified as part of the borough's housing land supply.</li> <li>• Request that the reference to the <b>Steers Lane</b> site in <b>Policy H2</b> should be changed to take account of Phase 2 and the additional dwellings expected to be delivered there.</li> <li>• Support for identification of <b>138-144 London Road</b> as a <b>Broad Location</b> in <b>Policy H2</b> as a means of maximising use of an under-occupied site in an accessible location.</li> </ul>	
<p><b>Meeting Housing Needs</b></p> <p><i>Comments on this Chapter were received from eight representors. These included a neighbouring authority, a national government agency, landowners, developers and planning agents, businesses and specific interest groups: Oxford Match Ltd.; The Planning Bureau; Muller Property Group; Horsham District Council; Homes England; Gatwick Airport Limited; Natural England; and Heine Planning Consultancy.</i></p> <p><i>Comments were received on Policies H4, H5 and H8.</i></p>	
<ul style="list-style-type: none"> <li>• Concern that it may not be appropriate, viable or commercially attractive to provide 3-bed properties in town centre locations, as sought by <b>Policy H4: Future Housing Mix</b>, and that the 'housing mix test' in the policy is overly prescriptive and potentially in conflict with statement in <b>paragraph 13.16</b> that 'family accommodation ... may not necessarily be suitable for all sites'. Policy should be amended to be more flexible.</li> </ul>	<p><b>Policy H4: Housing Mix</b></p> <p>CBC considers that there is a need for clear requirements in Policy H4: Housing Mix in order to support the effectiveness of the policy.</p> <p>Monitoring, as set out in the Crawley Local Plan Authority Monitoring Report 1 April 2020 – 31 March 2021 (Submission Document Reference: CB/AMR/02) has indicated that provision of smaller open market residential dwellings in recent years has been well in excess of local demand, and at the expense of providing family sized accommodation which is identified as needed within the borough in the Northern West Sussex Strategic Housing Market Assessment, November 2019 (Submission Document Reference: H/HN/01).</p> <p>The proposed dwelling mixes, informed by the Northern West Sussex Strategic Housing Market Assessment (Submission Document Reference: H/HN/01) are reflected in the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 and appendices (Submission Document References: DS/VA/02a and DS/VA/02b), and the Crawley Local Plan Viability Assessment Update, December 2022</p>

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Main Issues	How this was taken into account?
	(Submission Document References, DS/VA/01a and DS/VA/01b). These also take account of other policy requirements, as cumulative, including requirements in respect of affordable housing.
<ul style="list-style-type: none"> <li>• Recommendation that specialist older persons housing including sheltered and extra care accommodation should not be required to provide an affordable housing contribution under <b>Policy H5: Affordable Housing</b>, reflecting viability issues.</li> <li>• Concern that the proposed requirement within <b>Policy H5</b> for care homes to provide 'affordable care' will make delivery of care homes unviable, even though there is a clear need for this kind of development. The way in which the requirement is set out is overly prescriptive.</li> <li>• Acknowledgement of the specific provisions within <b>Policy H5: Affordable Housing</b> relating to the Town Centre and that the policy identifies circumstances where a commuted payment towards offsite delivery may be more appropriate.</li> </ul>	<p><u>Policy H5: Affordable Housing</u>            CBC considers that Policy H5: Affordable Housing, as now drafted, is consistent with and supported by the Crawley Local Plan &amp; Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/01a).</p>
<ul style="list-style-type: none"> <li>• Concern that Gypsy, Traveller and Travelling Showpeople need is not appropriately assessed for the purposes of <b>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</b>. There is an over-reliance on a reserve site that does not appear to be deliverable and would fail to address existing need; a lack of evidence of effort to identify new sites; and the criteria are not reasonable, fair and potentially offend legal requirements. Request that the GTAA be updated and made more robust.</li> <li>• Request that the reserve Broadfield Kennels site allocated in <b>Policy H8</b> be available to meet need arising elsewhere in the Housing Market Area.</li> <li>• Support of provisions within <b>Policy H8</b> which support the High Weald AONB Action Plan; confirmation that delivery of the site will need to be on a 'water neutral' basis; previous concerns regarding this policy arising from earlier proposals to review safeguarding are now overcome by the proposed reinstatement of <b>GAT2</b>.</li> </ul>	<p><u>Policy H8: Gypsy, Traveller and Travelling Showpeople Sites</u>            The Gypsy, Traveller and Travelling Showpeople Accommodation Needs Assessment has been updated for submission, July 2023 (Submission Document Reference: H/HN/02). The 2023 Update is set out on page 23 of this document, and confirms that further work is ongoing.</p>

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Main Issues	How this was taken into account?
<p><b>Green Infrastructure &amp; Biodiversity</b></p> <p><i>Comments on this Chapter were received from nine representors. These included a national government agency, landowners, developers and planning agents and specific interest groups: Natural England; Gatwick Green Limited; Woodland Trust; Sussex Wildlife Trust; Save West of Ifield Campaign; Homes England; The Planning Bureau; Manor Royal BID; and AITUP.</i></p> <p><i>Comments were received on general matters regarding the Environment Act as well as Policies G11, G12, G13 and G14.</i></p>	
<p><u>Green Infrastructure</u></p> <ul style="list-style-type: none"> <li>• <b>Policy G11: Green Infrastructure</b> received comments supporting reference to blue/green infrastructure protection and provision.</li> <li>• Natural England provided support for <b>Policy G11</b> as being consistent with national policy. Comments included ways to strengthen <b>Policy G11</b>, including reference Natural England's Green Infrastructure (GI) Framework and in particular, the updating of 'Accessible Natural Green Space Standards' (ANGSt) to Accessible Greenspace Standards and furthering the blue/green infrastructure network list and in the supportive text.</li> </ul>	<p><u>Policy G11: Green Infrastructure:</u></p> <p>Support noted for the inclusion of protection and provision of green and blue infrastructure within the Policy G11. The Local Plan refers to blue and green infrastructure and lists them in paragraph 14.13 (Submission Document Reference: CBLP/01).</p> <p>Support is noted for the Policy's inclusion of the requirement for developments to provide new and/or create links to green infrastructure.</p>
<p><u>Biodiversity Sites</u></p> <ul style="list-style-type: none"> <li>• Support was received for <b>Policy G12: Biodiversity Sites</b> and the requirements to address biodiversity being consistent with national policy.</li> <li>• Strong support was provided by Sussex Wildlife Trust for the inclusion of <b>Policy G12</b>.</li> <li>• The Woodland Trust supports the policy to prevent the loss of biodiversity and mitigate against any loss. Welcomes the recognition and guidance made for ancient wood pasture, historic parkland and unique value of ancient woodland.</li> <li>• Natural England supports <b>Policy G12</b> requirements for the protection of international/nationally designated sites and irreplaceable habitats and being in line with the NPPF and various goals and actions of the EIP.</li> <li>• A request for clarity in <b>Policy G12</b> regarding development in Local Wildlife Sites.</li> </ul>	<p><u>Policy G12: Biodiversity Sites:</u></p> <p>Support has been noted. The Local Plan Policy G12 is consistent with national policy. Section 2 of Topic Paper 8: Biodiversity Net Gain and Urban Greening (Submission Document Reference: DS/TP/08) sets out the background of the Environment Act, demonstrating that the policy is in line with national policy.</p> <p>Support for the recognition and guidance regarding ancient wood pasture, historic parkland and the unique value of ancient woodland within the policy has been noted.</p> <p>The policy recognises both prevention and mitigation of loss of biodiversity within the policy. In line with national policy, the Local Plan Policy similarly recognises the protection of both international and nationally designated sites. Paragraphs 14.25 and 14.26 of the Local Plan (Submission Document Reference: CBLP/01) identifies internationally and nationally designated sites nearby to Crawley.</p>
<p><u>Biodiversity and Net Gain</u></p> <ul style="list-style-type: none"> <li>• Support for <b>Policy G13: Biodiversity and Net Gain</b>, confirming that the policy provides appropriate and proportionate requirements for achieving biodiversity and net gain. Comments also support that it is in line with national policy.</li> <li>• Sussex Wildlife Trust supports <b>Policy G13</b> being in line with the NPPF and Environment Act 2021. However, suggest some policy wording changes could be made to be clearer on the delivery of Biodiversity Net Gain and the Urban Greening Factor.</li> </ul>	<p><u>Policy G13: Biodiversity and Net Gain:</u></p> <p>Support is noted for Policy G13: Biodiversity and Net Gain being in line with the NPPF and the Environment Act.</p> <p>Topic Paper 8: Biodiversity Net Gain and Urban Greening (Submission Document Reference: DS/TP/08), section 3.1.14 – 3.1.18, summarises when the delivery of Biodiversity Net Gain will be expected to be delivered by developments. These sections include the use of the metric, baseline date, mitigation hierarchy, and any exemptions.</p>

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<ul style="list-style-type: none"> <li>The Woodland Trust welcomes the inclusion of one new tree or equivalent soft landscaping for each new dwelling. Also welcomes the guidance for replacement trees not counting towards Biodiversity Net Gain, use of UK tree stock and that landscaping schemes should be agreed by the council.</li> <li>Natural England welcome achieving 10% Biodiversity Net Gain and wording relating to Nature Recovery Networks and Local Nature Recovery Strategy. Natural England have provided recommendation to further support the policy.</li> <li>Concerns with the approach taken in <b>Policy G13</b>, suggesting that the policy has gone beyond the Environment Act and has applied a sequential approach. Recommends that <b>Policy G13</b> should just refer to the Biodiversity metric and the Environment Act. Concerns raised with the expectation to increase tree cover, particularly on previously developed sites in urban areas.</li> <li>Homes England support <b>Policy G13</b> but suggest the January 2020 baseline date is not justified and suggest some modifications to the policy wording.</li> <li>Support for the <b>Policy G13</b> reflecting mandatory 10% biodiversity net gain enforced through the Environment Act 2021.</li> <li>Manor Royal BID requests applicants are informed about the Manor Royal Biodiversity Net Gain Plan.</li> </ul>	<p>Topic Paper 8, section 3.2.2, summarise how the urban greening factor should be used by developments.</p> <p>Support is noted for the inclusion of one new tree or equivalent soft landscaping per dwelling.</p> <p>Topic Paper 8, section 2: 'Background', summarises the Environment Act 2021 in the context of Biodiversity Net Gain, as well as providing supporting information regarding requirements, implementation and exemptions.</p> <p>Topic Paper 8, section 2.1.6, sets out the objectives of Biodiversity Net Gain, including the level of requirement.</p> <p>Topic Paper 8, section 3.1.5, sets the base line as January 2020 in accordance with the Environment Act.</p> <p>Topic Paper 8 sets out that the Biodiversity metric should be followed, also that the Policy is informed by the Environment Act. The Topic Paper, section 3, sets out the strategic issues for Crawley and the application of Net Gain within the borough.</p> <p>Topic Paper 8, section 3.1.7, summarises that management and maintenance measures should be in place throughout and after development.</p>
<p><u>Local Green Space</u></p> <ul style="list-style-type: none"> <li>Homes England supports <b>Policy G14: Local Green Space</b> but proposes modifications to the policy wording.</li> <li>Support has been received from the Sussex Wildlife Trust for the inclusion of <b>Policy G14</b>.</li> <li>Natural England supports the increased designation of Local Green Space in line with the NPPF and the aims of the EIP focused on creating and improving access to green space.</li> </ul>	<p><u>Policy G14: Local Green Space:</u> Support for Policy G14 is noted.</p> <p>Modifications to the Policy are not agreed or considered necessary. The Policy reflects national policy (NPPF paragraphs 101-103), the adopted Local Plan: Crawley 2030, December 2015, Policy ENV3 (Submission Document Reference: CBLP/02) and significant local support.</p>
<p><u>Sustainable Design &amp; Construction</u></p> <p><i>Comments on this Chapter were received from 15 representors. These included a local resident, a national government agency, neighbouring authorities, landowners, developers and planning agents and specific interest groups: Natural England, The Planning Bureau; AITUP; Manor Royal BID; local resident; Environment Agency; CPRE Sussex; Gladman Developments; Horsham District Council; Ardmore Ltd.; Persimmon Homes; Sussex Wildlife Trust; Home Builders Federation; Save West of Ifield Campaign; and Chichester District Council.</i></p> <p><i>Comments were received on Policies SDC1, SDC3 and SDC4.</i></p>	
<p><u>SDC1: Sustainable Design &amp; Construction</u></p> <ul style="list-style-type: none"> <li>Natural England outlined its support for the policy requirements concerning climate change mitigation and adaption. A further</li> </ul>	<p><u>Policy SDC1: Sustainable Design &amp; Construction</u> Expressions of support are noted.</p> <p>Policy SDC1 (Submission Document Reference: CBLP/01) is considered to strike an appropriate</p>

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Main Issues	How this was taken into account?
<p>representation also supported <b>SDC1</b>, considering it to appropriately support low carbon, energy efficient and sustainable development.</p> <ul style="list-style-type: none"> <li>A further representation considered the policy approach to be commendable, though advocated that it should largely be deleted with the council instead relying on the 2021 Building Regulations and Future Homes Standards.</li> <li>Manor Royal BID requests the council make applicants aware of the ReEnergise Manor Royal project.</li> </ul>	<p>balance between the need to ensure that development makes its contribution to climate change mitigation and the need to ensure that development remains viable.</p> <p>Further justification of the approach of Policies SDC1, SDC2: District Energy Networks and SDC3: Tackling Water Stress is set out in Topic Paper 6: Climate Change (Submission Document Reference: DS/TP/06).</p>
<p><u>Policy SDC3: Tackling Water Stress</u></p> <ul style="list-style-type: none"> <li>General support was expressed for the policy approach. Natural England supported the policy approach, though advised that wording could be strengthened to encourage application of more ambitious water efficiency standards and make clearer that 110l/p/d is the maximum rate. Environment Agency advised that further clarification should be provided as to how 'good' status for water bodies will be ensured. CPRE Sussex advised that the policy text should more explicitly acknowledge uncertainty regarding water supply over the Plan period.</li> </ul>	<p><u>Policy SDC3: Tackling Water Stress</u></p> <p>Support is noted.</p> <p>CBC has suggested a new paragraph 15.37 and footnote added to address comments raised by Environment Agency and Natural England. See Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) pages 12-13.</p>
<p><u>Policy SDC4: Water Neutrality</u></p> <ul style="list-style-type: none"> <li>Representations were generally supportive of the policy approach.</li> <li>Natural England supported the policy approach, considering it sufficient to rule out an adverse effect on the integrity of protected Arun Valley sites, though suggested some modifications to the policy wording and supporting text to improve its robustness.</li> <li>Horsham District Council and Chichester District Council outlined strong support for the policy approach and continued joint working between the Local Authorities to comply with water neutrality requirements.</li> <li>Representations from wildlife organisations, whilst supportive, considered that the policy should be clearer that offsetting would need to be in place prior to the occupation of development, and suggested modifications to this effect. A further representation questioned whether the policy text sufficiently captures all forms of development that are subject to water neutrality, for example swimming pools.</li> <li>Development industry representatives welcomed the councils' efforts to address water neutrality through joint working, though expressed frustration that developers, rather than Southern Water, are being asked to address this issue. Some textual modifications were suggested, including wording that would</li> </ul>	<p><u>Policy SDC4: Water Neutrality</u></p> <p>Support for Policy SDC4 approach is noted.</p> <p>The background of the water neutrality issue and the rationale of the policy are set out in the Joint Water Neutrality Topic Paper, May 2023 (Submission Document Reference: DS/TP/00).</p> <p>Suggested new wording proposed to Policy SDC4 and supporting text to address points raised by Natural England and CPRE Sussex. See Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) pages 13-16 which has addressed the concerns.</p> <p>A Statement of Common Ground (Submission Document Reference: SoCG/03) has been agreed between the parties.</p> <p>Further information on the council's recent consideration of the representations made on the 2023 Local Plan as part of the Regulation 19 Consultation as well as on other matters feeding into the proposed modifications is set out in the Water Neutrality Progress Update, July 2023 (Submission Document Reference: DS/TP/00).</p> <p>Support and comments from development industry representatives is noted.</p> <p>It is considered that modifications suggested by the development industry are best discussed at the formal Local Plan Examination Hearings to ensure</p>

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<p>enable adaptation should water neutrality no longer be required at a future point within the Plan period. One representation questioned whether the Local Plan viability work has fully considered cost implications for developers, considering that Local Plan progression should be delayed until the Local Authority-led offsetting scheme is in place. The need for timely progression of the offsetting scheme was reiterated.</p>	<p>that any implications of amending text can be fully considered and understood.</p>
<p><b>Environmental Protection &amp; Noise Annex</b></p> <p><i>Comments on this Chapter were received from nine representors. These included a national government agency, utilities providers, landowners, developers and planning agents and businesses and specific interest groups: Thames Water; Gatwick Green; Environment Agency; National Highways; Gatwick Airport Limited; Homes England; Bellway Homes; Persimmon Homes; Save West of Ifield Campaign; and Natural England.</i></p> <p><i>Comments were received on the Noise Annex from one representor: Bellway Homes.</i></p> <p><i>Comments were received on Policies EP1, EP2, EP4, EP5 and EP6 and the Noise Annex.</i></p>	
<p><u>Policy EP1: Development and Flood Risk &amp; Policy EC2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions</u></p> <ul style="list-style-type: none"> <li>The Environment Agency outlined support for the approach of <b>Policies EP1 and EP2</b>, considering these to represent an appropriate approach to managing flood risk. It welcomed changes made to policies and supporting text, bringing the Local Plan into line with the updated PPG (August 2022). The EA advised that the 2020 SFRA remains fit for purpose, though advise that consideration is given to updating it when new or revised information become available.</li> <li>Thames Water and Gatwick Green Limited also outlined support for <b>Policy EP1</b>.</li> </ul>	<p><u>Policy EP1: Development and Flood Risk &amp; Policy EP2: Flood Risk Guidance for Householder Development and Minor Non-Residential Extensions</u></p> <p>Support is noted.</p> <p>CBC note Environment Agency advice that the 2020 Strategic Flood Risk Assessment (Submission Document Reference: ES/EP/02) is robust, though would benefit from a discrete update to reflect updated Planning Practice Guidance. This work is being prepared in liaison with the Environment Agency in order to address the concerns.</p>
<p><u>Policy EP4: Development and Noise and Noise Annex</u></p> <ul style="list-style-type: none"> <li>Gatwick Airport Limited, whilst welcoming amendments made to the policy following previous representations, reiterated previous concerns relating to identification of the 60dB LAeq contour as the threshold for ‘unacceptable’ noise levels. GAL welcomed the addition of text relating to possible updates to the Gatwick Airport noise contours.</li> <li>Development industry representatives objected to the <b>Policy EP4</b> approach, outlining concern that the identification of the ‘unacceptable’ noise level based on thresholds and using external noise levels does not allow for mitigation that reduce noise impacts for habitable areas. Suggested modifications included reinstatement of the 66dB LAeq contour as the threshold for ‘unacceptable’</li> </ul>	<p><u>Policy EP4: Development and Noise and Noise Annex</u></p> <p>It is appropriate for the Local Plan to include noise metrics, as supported by national policy.</p> <p>Comments noted regarding the specific noise values set out in the Noise Annex. This is supported by evidence provided in Topic Paper 7: Development and Noise Technical Appendix (Submission Document Reference: DS/TP/07).</p>

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Main Issues	How this was taken into account?
<p>noise (as per the adopted 2015 Local Plan). Another representation considered that noise metrics for the 'unacceptable' noise level should be deleted entirely.</p> <ul style="list-style-type: none"> <li>A further representation considered that the health impacts of noise from the construction phase of development should be monitored.</li> </ul>	
<p><u>Policy EP5: Air Quality</u></p> <ul style="list-style-type: none"> <li>Natural England outlined its support for this policy. A separate representation noted that the policy lacks detail on how the health impacts of air quality will be monitored.</li> </ul>	<p><u>Policy EP5: Air Quality</u> Support for Policy EP5 is noted.</p> <p>With regards to monitoring, CBC publishes an Air Quality Annual Status Report in fulfilment of Part IV of the Environment Act 1995: Local Air Quality Management – see Crawley Borough Council's 2022 Air Quality Annual Status Report (Submission Document Reference: ES/EP/16).</p>
<p><u>Policy EP6: External Lighting</u></p> <ul style="list-style-type: none"> <li>National Highways set out that the policy should include a requirement for the assessment of brightness impacts where external lighting is proposed in close proximity to the strategic road network.</li> </ul>	<p><u>Policy EP6: External Lighting</u> Comment is noted. A proposed modification has been suggested to capture this point, see Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 16.</p>
<p><u>Sustainable Transport, Transport Modelling &amp; Parking Standards Annex</u></p> <p><i>Comments on this Chapter were received from 15 representors. These included a neighbouring local authority, national government agencies, the county councils, landowners, developers and planning agents, businesses and specific interest groups: Save West of Ifield Campaign; Surrey County Council; National Highways; Gatwick Green Ltd.; Gatwick Airport Limited; Homes England; West Sussex County Council; Horsham District Council; Ardmore Ltd.; The Barker Trust; Sussex Wildlife Trust; Woodland Trust; BYM Capital; Manor Royal BID; and AITUP.</i></p> <p><i>Comments were received on the Parking Standards Annex from one representor: West Sussex County Council.</i></p> <p><i>Comments were received on the Chapter and the approach to Transport Modelling in general as well as specific Policies ST1, ST2, ST3 and ST4 and the Parking Standards Annex.</i></p>	
<ul style="list-style-type: none"> <li>Expressions for support for the general approach of <b>Policy ST1: Development and Requirements for Sustainable Transport</b>.</li> <li>National Highways recommend that <b>Policy ST1</b> be amended to more strongly reflect 'vision and validate' approach in relation to management of demand for travel and transport impacts.</li> <li>Gatwick Airport Limited recommend that <b>Policy ST1</b> could be strengthened by being more explicit about need to need to consider impacts on major infrastructure such as Gatwick Airport as part of Transport Assessment - as previously recommended.</li> <li>Gatwick Green Ltd (The Wilky Group) provide commentary highlighting the consistency of the approach detailed in <b>Policy ST1</b> with the proposed Gatwick Green allocation included in <b>Policy EC4</b>.</li> </ul>	<p><u>Policy ST1: Development and Requirements for Sustainable Transport</u> Expressions of support are noted.</p> <p>Ongoing work with National Highways is reflected in the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a). This confirms the work agreed as part of the preparation of the Local Plan and since the close of the 2023 Local Plan Regulation 19 consultation. It also establishes the outstanding work areas, including production of a checklist setting out how the Local Plan strategy follows the approach detailed in Circular 01/2022.</p> <p>Local Plan Schedule of Suggested Modifications, July 2023 (Submission Document Reference: CBLP/07) page 16, includes a suggested modification to the policy to refer to the Department for Transport Circular cited by National Highways. Subject to this change, CBC considers that the</p>

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Main Issues	How this was taken into account?
	<p>Policy sets out an appropriate framework for the consideration of the transport implications of development.</p> <p>Further justification of the approach is set out in Topic Paper 6: Climate Change (Submission Document Reference: DS/TP/06).</p>
<ul style="list-style-type: none"> <li>Concern that <b>Policy ST1</b> fails to include requirement for new cycling infrastructure within the borough to be provided by new developments coming forward on Crawley's boundaries. Need to acknowledge extent to which active travel/public transport infrastructure must be improved in order for non-car options to be genuinely prioritised.</li> <li>Manor Royal BID request to be engaged in supporting applicants to prepare travel plans and provision of EV charging.</li> </ul>	<p><u>Policy ST2: Car and Cycle Parking Standards</u> It is anticipated that national standards for provision of EV charging infrastructure will be in place at the time of adoption of the Local Plan and that the requirements of Policy ST2: Car and Cycle Parking Standards will not exceed these.</p> <p>The local standards are retained at present pending assurance that the standing of Part S of the Building Regulations will not be affected by the Retained EU Revocation and Reform Act 2023.</p>
<ul style="list-style-type: none"> <li>Gatwick Airport Limited no longer object to <b>Policy ST3: Improving Rail Stations</b>, as amended.</li> <li>Homes England continue to support <b>Policy ST3</b>.</li> </ul>	<p><u>Policy ST3: Improving Rail Stations</u> Withdrawal of previous objections noted. Policy as updated is considered to reflect the roles, potential, characteristics and constraints of individual railway stations.</p> <p>Support for policy noted.</p>
<ul style="list-style-type: none"> <li>National Highways consider that based on current information <b>Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link</b> will not have an unacceptable impact on the Strategic Road Network.</li> <li>Some expression of support for the general approach of <b>Policy ST4</b>.</li> <li>West Sussex County Council withdraws its objection to <b>Policy ST4</b> following further work on the proposed area of search.</li> <li>Horsham District Council acknowledge joint working in respect of <b>Policy ST4</b> and support the policy subject to need for joint agreement on corridor.</li> <li>Homes England support the progress made within the revised policy wording and evidence relating to the areas of search for the Crawley Western Multi-Modal Transport Link found within <b>Policy ST4</b>, with reference and support for the text of <b>paragraph 17.29</b>. Homes England support the flexible approach at the eastern (A23) end of the proposed link that seeks to balance the risk of safeguarding conflict against the potential loss of employment land and ability to deliver the Western Multi-Modal Transport Link as a strategic transport link. Homes England suggest some policy wording in order to support the deliverability of the scheme.</li> <li>Objection that search corridor identified in <b>Policy ST4</b> encroaches into the safeguarded area and is therefore in conflict with <b>Policy</b></li> </ul>	<p><u>Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link</u> The Crawley Western Link Road Study (Submission Document Reference: ES/ST/02a) was undertaken following the previous Regulation 19 consultation (2021) to refine the Area of Search shown on the Local Plan Map and referred to in Policy ST4. The route options identified within the evidence study are indicative only for the purposes of assessing a reasonable range of possible options, and do not suggest a preferred or final route option in any case.</p> <p>An alternative Area of Search is suggested for the interim period unless and until such a time when a southern runway is pursued by Gatwick Airport. Given that this use would be interim only, there is no justification for a permanent employment site in the safeguarded land, as this would be contrary to Policy GAT2.</p>

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Main Issues	How this was taken into account?
<p><b>GAT2</b> and the requirement to safeguard land for a potential wide-spaced southern runway.</p> <ul style="list-style-type: none"> <li>• Objection that <b>Policy ST4</b> is not effective, justified, or sound, given its relationship with <b>Policy GAT2</b> and other policies.</li> <li>• Objections/concerns regarding the proposed area of search in <b>Policy ST4</b> on basis of its impact on nearby opportunities for delivery of employment-related development. An alternative area with a different alignment forming part of the Jersey Farm masterplan is put forward as being preferable.</li> <li>• Proposed amendments to <b>Policy ST4</b> to strengthen consideration of impact on biodiversity sites.</li> <li>• Acknowledgement of potential suitability of the Western Multi-Modal Transport Link as a potential means of mitigating impact of Gatwick DCO proposals.</li> <li>• Query as to whether the Western Multi-Modal Transport Link is the right approach given impact on heritage, character, setting of the borough, noise, biodiversity, and air pollution.</li> <li>• Concern is raised by BYM Capital where the Area of Search for the Crawley Western Multi-Modal Transport Link Corridor includes land within their ownership.</li> <li>• Manor Royal BID questions the extent of the Area of Search to the east.</li> </ul>	
<p><u>Transport Modelling</u></p> <ul style="list-style-type: none"> <li>• National Highways express concern that the Local Plan falls short of meeting the ‘justified’ soundness test because the Crawley Transport Study does not make proportionate allowance for the scale of development which could come forward in the later part of the Local Plan period, and the forecast year given in the Study (2035) falls five years before the Local Plan end date (2040).</li> <li>• Requests for sensitivity testing of impact of Gatwick Airport Northern Runway DCO proposals.</li> </ul>	<p><u>Transport Modelling</u></p> <p>Ongoing work with National Highways is reflected in the Crawley Borough Council and National Highways Statement of Common Ground (Submission Document Reference: SoCG/15a). This confirms the work agreed as part of the preparation of the Local Plan and since the close of the 2023 Local Plan Regulation 19 consultation. It also establishes the outstanding work areas, including production of a checklist setting out how the Local Plan strategy follows the approach detailed in Circular 01/2022.</p> <p>The Crawley Transport Modelling Study, June 2022 (Submission Document Reference: ES/ST/01a) is now supported by the Crawley Transport Modelling Study TN02 GAL Sensitivity Test, June 2023 (including consideration of the impact of the current Gatwick Airport Development Consent Order Proposal) and Crawley Transport Modelling Study TN03 Gatwick Green Trip Generation Comparison, June 2023 (Submission Document Reference: ES/ST/01w).</p>
<p><u>Parking Standards Annex</u></p> <ul style="list-style-type: none"> <li>• Recommendation that the Annex be updated to reflect fact that there is now national guidance</li> </ul>	<p><u>Parking Standards Annex</u></p> <p>It is anticipated that national standards for provision of EV charging infrastructure will be in place at the time of adoption of the Local Plan and that the</p>

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Main Issues	How this was taken into account?
<p>regarding provision of electric vehicle charging infrastructure.</p>	<p>requirements of Policy ST2: Car and Cycle Parking Standards will not exceed these.</p> <p>The local standards are retained at present pending assurance that the standing of Part S of the Building Regulations will not be affected by the Retained EU Revocation and Reform Act 2023.</p>
<p><b>Duty to Cooperate</b></p> <p><i>Comments relating to the Duty to Cooperate were received from two representors as part of the Regulation 19 Consultation on the Local Plan (in addition to representations made on unmet needs which have been covered in the Housing Needs Chapter and directly in relation to the Duty to Cooperate Statement): National Highways; and Homes England.</i></p>	
<ul style="list-style-type: none"> <li>National Highways reiterated its view that the Local Plan is legally compliant in respect of the Duty to Cooperate. This representation confirmed CBC has engaged constructively, actively and on an ongoing basis on strategic planning matters relating to the SRN during the preparation of the Local Plan.</li> <li>Homes England believes that without a signed Statement of Common Ground between Crawley and remaining authorities, in particular Horsham District Council, the Local Plan cannot be considered legally compliant or sound.</li> </ul>	<p>National Highways confirmation of Duty to Cooperate is noted. The Statement of Common Ground between Crawley Borough Council and National Highways has been agreed and published (Submission Document Reference: SoCG/015a).</p> <p>CBC disagrees that the Local Plan is not legally compliant or sound on the basis of Duty to Cooperate. Substantial ongoing, positive and effective, joint working has continued between Crawley Borough Council and its neighbouring authorities since the adoption of the of the existing Local Plan: Crawley 2030, December 2015, and as part of the Local Plan Review (Submission Document Reference: KD/DtC/01). This is set out in the council's Duty to Cooperate Statement and has also been reported annually in the Local Plan Authority's Monitoring Reports (Submission Document References: CB/AMR/02 – CB/AMR/07).</p> <p>A signed Statement of Common Ground between Crawley Borough Council and Horsham District Council has been submitted with the Local Plan (Submission Document Reference: SoCG/07). A signed Statement of Common Ground between Crawley Borough Council and Mid Sussex District Council, July 2023, has also been submitted with the Local Plan (Submission Document Reference: SoCG/08). Other signed Statements of Common Ground with neighbouring authorities include Reigate and Banstead Borough Council, Mole Valley District Council, Tandridge District Council, Arun District Council and Adur and Worthing Councils (Submission Document References: SoCG/06, SoCG/09 – SoCG/13). These have been agreed during the Local Plan Review process. All neighbouring authorities were contacted in April 2023 to confirm whether the positions remained up-to-date or offered the opportunity to update or produce new Statements of Common Ground (Appendix J and Appendix K, Duty to Cooperate Statement, Submission Document Reference: KD/DtC/01).</p>

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Main Issues	How this was taken into account?
	<p>Statements of Common Ground (or as previously known as Position Statements) have been agreed across the Northern West Sussex Authorities historically, since 2013, and continually updated. As part of the Local Plan Review this has included the May 2020 Northern West Sussex Statement of Common Ground (Submission Document Reference: SoCG/14) and its signed recent updates – Northern West Sussex Statement of Common Ground, July 2023, and Northern West Sussex Housing Needs Statement of Common Ground, July 2023 (Submission Document References: SoCG/01 and SoCG/02).</p> <p>Development outside the borough’s administrative boundaries is outside of the control of Crawley Borough Council and the remit of the Local Plan. However, the council takes a positive and active role in discussions in relation to the Duty to Cooperate and as a Statutory Consultee in both the Local Plan and Development Management processes of the adjoining Local Planning Authorities, within which the strategic developments are proposed. The policies within the Local Plan address the potential impacts as far as possible should strategic scale development come forward on, or close to, the borough’s boundaries (including Policy GI4: Local Green Space and Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link). Local Plan evidence has sought, wherever possible, to include the potential impacts (such as the Crawley Transport Modelling Study, scenario 3, Submission Document Reference: ES/ST/01a, and the Crawley Western Link Road Study, Submission Document Reference: ES/ST/02, and the Open Space, Indoor Sports and Playing Pitch Strategy Studies, Submission Document References: WC/OSS/01 – WC/OSSR/04 and the Local Plan Infrastructure Plan, Submission Document Reference: KD/IP/01). Submission Local Plan paragraphs 12.17-12.23 (Submission Document Reference: CBLP/01) provide an appropriate statement of the council’s approach to engagement with strategic development proposals ‘at Crawley’, following the removal of the 2020 draft Policy H3g (Submission Document Reference: CBLP/05).</p>
<p><b>Sustainability Appraisal/Strategic Environmental Assessment</b>  <i>Comments on the Sustainability Appraisal/Strategic Environmental Assessment were received from seven representors: HX Properties Ltd.; Gatwick Green Limited; Reigate and Banstead Borough Council; Historic England; Environment Agency; Natural England; and a local resident.</i></p>	
<ul style="list-style-type: none"> <li>HX Properties Ltd raises various objections to the SA/SEA. In relation to the assessments of Policy EC7 (hotel and visitor accommodation) they consider that further options should have been assessed. In relation to Policy GAT3, the</li> </ul>	<p>Comments noted.</p> <p>Representations received against the SA/SEA have been published in its Appendix at each stage of public consultation (Submission Document</p>

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Main Issues	How this was taken into account?
<p>representation considers that Policy GAT3 should be re-appraised, with a further option considered.</p> <ul style="list-style-type: none"> <li>• Gatwick Green Limited considers the SA/SEA to be legally compliant and supports its findings in relation to Policies EC1, EC4, ST1, IN1, and GAT2.</li> <li>• Reigate and Banstead Borough Council has withdrawn its previous written concerns on legal compliance (Policy EC1).</li> <li>• Historic England is content that the SA report for the Crawley Local Plan adequately covers the issues that may arise in respect of the potential effects of proposed development sites on heritage assets.</li> <li>• Environment Agency welcomed recognition in the SA/SEA regarding the managing of flood risk in the borough.</li> <li>• A respondent noted that in relation to Policy SDC1, reference should be made to the minimum BREEAM standard and the use of the Passiv Haus standard.</li> </ul>	<p>References: KD/SA/02, Appendix B and C, and KD/SA/03, Appendix B, C and D).</p> <p>The council has revisited the SA/SEA and updated and amended it where considered appropriate (Submission Document Reference: KD/SA/01).</p> <p>CBC is not proposing any further options assessments at this time and consider that reasonable alternatives have been evaluated.</p> <p>Wider support for the SA/SEA (Submission Document: KD/SA/01) is noted.</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p>
<p><b>Local Plan Map</b>  <i>Comments on the Local Plan Map were received from four representors: Save West of Ifield Campaign; a local resident; Ardmore Ltd. and Arora Management Services.</i></p>	
<ul style="list-style-type: none"> <li>• <b>Heritage:</b> Noted that list of heritage assets under Policy HA1 does not include village greens. A resident response sought amendment of the Hazelwick Road Conservation Area boundary.</li> <li>• <b>Gatwick Airport:</b> Arora Group has objected to the removal of Schlumberger House from the Gatwick Airport boundary.</li> <li>• Vail Williams (on behalf of Ardmore Ltd) requested that the <b>Built Up Area Boundary</b> should be realigned, considering that a Crawley Western Multi-Modal Transport Link would fundamentally change the character and setting of the Upper Mole Farmlands Rural Fringe.</li> </ul>	<p>Village Greens are a specific designation relating to the use of space for lawful sports and pastimes by the local community. It is not intrinsically a heritage-based designation. CBC considers that Ifield Village Green has appropriate recognition as a heritage asset as an important feature of Ifield Village Conservation Area which is recognised in the relevant Conservation Area Statement.</p> <p>Schlumberger House is not included within the airport boundary identified by Gatwick Airport, nor is it currently in airport-related use. There is no justification for its inclusion within the airport boundary.</p> <p>Disagree with comment that the Built-Up Area Boundary should be remodelled due to the Area of Search for the Crawley Western Multi-Modal Transport Link. The Crawley Western Link Road Study (Submission Document Reference: ES/ST/02a) was undertaken following the previous Regulation 19 consultation (2021) to refine the Area of Search shown on the Local Plan Map and referred to in Policy ST4. The route options identified within the evidence study are indicative only for the purposes of assessing a reasonable range of possible options, and do not suggest a preferred or final route option in any case.</p>

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### Main Issues

### How this was taken into account?

#### Habitats Regulations Assessment

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

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

Comments on the final submission Habitats Regulations Assessment Report (Submission Document Reference: KD/HRA/01) are noted.

The Habitats Regulations Assessment Report, January 2023 (Submission Document Reference: KD/HRA/01) provides a table summarising the representations received at each stage of public consultation and how these have been addressed (Table 3.2, pages 22-25).

A report relating to the work undertaken in relation to the Habitats Regulations was published at every stage of Local Plan formal consultation (Regulation 18 and each of the three Regulation 19 consultations). This included the scoping and screening reports prepared in-house (Submission Document References: KD/HRA/03 and KD/HRA/04). When feedback from emerging evidence indicated there was a need for an Appropriate Assessment to be carried out, this was undertaken and published in draft (Submission Document Reference: KD/HRA/02) prior to the final report, January 2023, being published alongside the Submission Local Plan consideration through the committee cycle to Full Council in February 2023 and for Publication Regulation 19 Consultation in May 2023 (Submission Document Reference: KD/HRA/01).

The council has worked jointly with the other authorities within the Ashdown Forest area in relation to Air Quality Monitoring, Transport Monitoring and Air Quality Modelling. The Crawley Borough Local Plan Habitats Regulations Assessment Air Quality Modelling and Transport Modelling has been carried out in line with the signed Ashdown Forest Statement of Common Ground (Submission Document Reference: SoCG/05). More information of the joint working on this is set out in the Duty to Cooperate Statement, July 2023 (Submission Document Reference: KD/DtC/01) and the Habitats Regulations Assessment Report (Submission Document Reference: KD/HRA/01).

The council has worked jointly with the other affected Local Authorities within the Southern Water Sussex North Water Resource Zone, along with Natural England, Southern Water, Environment Agency, Defra, DLUHC and Ofwat to address the issues around water supply impacts on Internationally designated sites. This has included the preparation and agreement/endorsement of the

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Main Issues	How this was taken into account?
	<p>Water Neutrality Study (Submission Document References: ES/SDC/05 - ES/SDC/07) and the agreement of a Water Neutrality Statement of Common Ground, July 2023 (Submission Document Reference: SoCG/03). A summary of the issue and work carried out is set out in the Water Neutrality Topic Paper, May 2023, and Progress Update, July 2023 (Submission Document Reference: DS/TP/00). Work is ongoing to secure the full Implementation Scheme (Sussex North Offsetting Water Scheme) and pilots are already progressing within Crawley.</p> <p>How the council has met the legal requirements of the Local Plan preparation (including the Duty to Cooperate, Sustainability Appraisal, Consultation and Habitats Regulations) is set out in the Local Plan Review PAS Toolkit 3: Process (July 2023).</p>
<p><b>Viability Assessment &amp; Planning Obligations Annex</b>  <i>Comments relating to the Viability Assessment and Planning Obligations Annex were received from five representors: Gladman Developments; West Sussex County Council; The Planning Bureau Ltd.; Gatwick Green Ltd.; and Network Rail.</i></p>	
<p><b>Planning Obligations Annex</b></p> <ul style="list-style-type: none"> <li>The Annex should take account of the likelihood that mitigation of impacts of development on level crossings may need to be funded and implemented - at no cost to Network Rail. Risk assessment should be undertaken for individual applications to determine impact.</li> <li>The wording of the annex should be amended to clarify that requirement for skills contribution/support could in some circumstances be satisfied on site/in kind.</li> <li>Comments regarding anticipated funding needs for additional General Practice capacity.</li> <li>Further commentary noting approach set out in the Annex.</li> </ul> <p><b>Viability Assessment</b></p> <ul style="list-style-type: none"> <li>Figure of £2,000 per dwelling used in the Viability Assessment to reflect the costs of meeting Water Neutrality requirements does not sufficiently reflect estimated cost of higher-cost approaches as reflected in the Topic Paper - i.e. greywater recycling.</li> <li>The Viability Assessment should be updated to take account of previous representations made in relation to costs of providing older persons' accommodation and extra care housing.</li> <li>Acknowledgement that Viability Assessment has been amended in response to previous comments in order to clarify that S106 contributions could in some circumstances be sought for Education and other infrastructure.</li> </ul>	<p>CBC considers that the Planning Obligations Annex gives appropriate information to applicants, developers and other stakeholders about the likely costs associated with development, without closing off the option of using planning obligations for more specific purposes where appropriate for particular developments, in accordance with the CIL Regulation 122 tests.</p> <p>CBC considers that the costs imposed by the Planning Obligations Annex are adequately taken account of in the Crawley Local Plan and Community Infrastructure Levy Viability Assessment, March 2021 (Submission Document Reference: DS/VA/02a) and appendices, and the Crawley Local Plan Viability Assessment Update, December 2022 (Submission Document Reference: DS/VA/01a).</p>