

oy Crawley Borough Loc

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February 2023) by Full Council and securing formal Full Council approval for Publication and Submission. All of the details from the Council and Cabinet meetings can be accessed from the council's website.

1.1.8 In response to the formal public consultations carried out on the emerging Local Plan, in accordance with Regulation 22, the Crawley Consultation Statement (Submission Document Reference: KD/CS/01a) set out which bodies and persons the local planning authority invited to make representations under Regulation 18 (i); how those bodies and persons were invited to make representations under Regulation 18 (ii); a summary of the main issues raised by the representations made pursuant to Regulation 18 (iii); how any representations made pursuant to Regulation 18 were taken into account (iv); the number of representations made in response to Regulation 19 (v); and a summary of the main issues raised in those representations (vi).

1.2 Question 1.2: Is it clear which development plan policies (2015 Crawley Local Plan) would be superseded on adoption of the submitted Plan? [Regulation 8(5) of the 2012 Local Plan Regulations requires that superseded policies must be identified]. Are there any development plan document policies that are intended to be 'saved' on adoption of the Crawley Borough Local Plan 2024 – 2040?

and 1.3, Paragraph 153, page 9 (07/50 Crawley Borough Submission Local Plan, Feb 2023) 0 0 1 251.69 460.8 (Submission Document Reference: CBLP/01)

development of Kilnwood Vale neighbourhood, predominately within Horsham District, but with some aspects, particularly in relation to infrastructure connections, falling within Crawley borough.

- 1.3 Question 1.3: For the purposes of strategic planning and any subsequent neighbourhood plan preparation does the submitted plan clearly identify which policies would be 'strategic policies'? Is the identification of strategic policies justified and consistent with NPPF paragraph 20? For example, is it justified the Policy DD4 (Tree Replacement Standards) is labelled a strategic policy? Should policies on matters such as water resources (SDC4 for example) be identified as strategic policies?
 - 1.3.1 Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) contains 20 strategic policies. These are clearly identified within the document as "Strategic Policy".
 - 1.3.2 The National Planning Policy Framework (NPPF), 2021, paragraph 20, page 9 (Post-Submission Document Reference: PS/DS/NPPF/01) confirms that strategic policies

economic growth and social mobility, maximising benefits of Gatwick Airport and a revitalised and vibrant town centre (Table 4.1, page 27 & Appendix E, pages 145-159). Topic Area F relates to Transport and Infrastructure, including roads, rail, public transport, walking, cycling, Gatwick Airport and infrastructure (Table 4.1, page 27 & Appendix E, pages 139-144). All of these topics are known to have particular importance and impacts on those with protected characteristics.

- 1.4.6 The overall strategy approach: a combination of the sub-regional focus and Crawley borough focus (Appendix F, pages 192-193) confirmed that careful planning and ensuring developments constitute sustainable development may allow for positive impacts for SA Objective 9.
- 1.4.7 Through the Draft Consultation Local Plan Policies Options and Appraisal (Appendix G, pages 196-301), 32 policies were identified to have a significant positive impact on SA Objective 9. A further 42 Policies were identified to have a positive impact on SA Objective 9. Four policies were identified to have possible positive impacts.
- 1.4.8 Three Local Plan Policies seek to directly address issues of equality – Policy SD2: Enabling Healthy Lifestyles and Wellbeing (which introduces a requirement for Health Impact Assessment as part of planning application submissions); Policy DD2: Inclusive Design and Policy H8 1 3oliCritic

- Strategic Geographic Context (County-wide and Housing Market Area): Northern West Sussex Statement of Common Ground (SoCG/01); Northern West Sussex Housing Needs Statement of Common Ground (SoCG/02); West Sussex Statement of Common Ground (SoCG/04); and Northern West Sussex Statement of Common Ground, May 2020 (SoCG/14).
- Issue/Topic Matters (Water Neutrality, Ashdown Forest and Transport): Water Neutrality Statement of Common Ground (SoCG/03); Ashdown Forest Statement of Common Ground (SoCG/05); Crawley Borough Council and National Highways Statement of Common Ground (SoCG/015a); and Crawley Borough Council and West Sussex County Council Statement of Common Ground (SoCG/016).
- Cross-Boundary 1:1 Local Authority (including development needs and unmet development needs, strategic sites and infrastructure): Crawley Borough Council and Horsham District Council Statement of Common Ground (SoCG/07); Crawley Borough Council and Mid Sussex District Council Statement of Common Ground (SoCG/08)

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1.8.4 Responses received from the other local authorities clearly indicate an inability for

and political processes and it was agreed it would be impractical for any one authority to delay the progression of its Local Plan due to circumstances affecting another. As can be seen from the Northern West Sussex Statement of Common Ground, July 2023, Section 6, page 8 (Submission Document Reference: SoCG/01), even at the point of the submission of the Crawley Borough Local Plan for its independent Examination, the timetable for the Horsham District Local Plan, particularly, was still uncertain and unset.

1.9.4

Horsham District Council, and Crawley Borough Council and Mid Sussex District Council in relation to strategic development 'at Crawley'.

- 1.10.5 The Crawley Borough Submission Local Plan (Submission Document Reference: CBLP/01) is clear where it can be in relation to the approach CBC will take in

KD/SA/01) confirms that whilst the Plan Area is Crawley borough, the baseline information and assessments undertaken for this SA report could be applied to areas beyond the boundary of Crawley during the life of the Plan (whilst the SA/SEA undertaken for such developments would be the responsibility of the relevant

development. This is based on the growth proposals of the Crawley Borough Local Plan and the existing Local Plans for neighbouring authorities (the adopted Horsham District Planning Framework, Mid Sussex District Plan and the Reigate and Banstead Core Strategy and Development Management Plan). Further cumulative impacts from additional development close to Crawley will exacerbate existing capacity issues on roads within Crawley.

- 1.11.9 Scenario 3 in the Crawley Transport Modelling Study, June 2022 (Submission Document Reference: ES/ST/01) sought to consider further growth at Crawley, up to meeting the full Standard Method housing need from within the borough (at the time: 751 dwellings per annum) – for the purposes of the study the additional growth was located West of Ifield (3,750 dwellings) and West of Kilnwood Vale (1,546 dwellings).
- 1.11.10 Whilst the Crawley Transport Modelling scenario 3 included strategic development in the location to the west of Crawley, it is for the transport modelling for the respective Local Plans in the districts which are promoting the developments on the borough's boundaries to fully consider the impacts of the proposals on the network in combination with the other developments. This is set out in paragraphs 17.21 and 17.23 of the Crawley Borough Local Plan.
- 1.11.11 West Sussex County Council has supported all three authorities in preparing the Transport Modelling for each Local Plan to ensure consistency in approach and in-combination development and impacts are taken into account for all of the studies. For Crawley and Horsham, the same consultants have undertaken the studies.
- 1.11.12 The Crawley Local Plan seeks to address potential impacts from strategic development outside the administrative boundary. In particular, the Local Plan Policy ST4: Area of Search for the Crawley Western Multi-Modal Link is proposed to support further work to be carried out in the future by the appropriate body responsible for delivery of the route in order to address significant development to the west of Crawley. The Transport Modelling Study also provided a sensitivity testing in the case of a Crawley Western Link Road (Chapter 9, pages 113-116).

Education

- 1.11.13 West Sussex County Council Local Education Authority advises the three Northern West Sussex authorities in relation to educational needs. This advice is reflected in the Crawley Infrastructure Plan, page 22 (Submission Document Reference: KD/IP/01), and in the Northern West Sussex Statement of Common Ground, July 2023, pages 6-7.
- 1.11.14 In particular, opportunities for Crawley's secondary education needs to be addressed through neighbouring development has formed a key part of the discussions relating to strategic development 'at Crawley', as set out in the Infrastructure Plan, page 22.

Waste Water Treatment

- 1.11.15 The Duty to Cooperate Statement, Issue G (section 3.7, pages 44-47) confirm the joint working undertaken in relation to waste water treatment. This has included joint meetings across the Northern West Sussex Authorities with Thames Water, the waste water infrastructure provider for Crawley, and the joint commissioning of the

Water Cycle Study evidence document, August 2020 (Submission Document Reference: ES/SDC/09).

1.11.16

and took into consideration mitigation measures which are secured through policies proposed in the Crawley Borough Submission Local Plan.

Topic Paper 6: Climate Change, July 2023, paragraph 1.1, page 5 (Submission Document Reference: DS/TP/06) as follows:

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7. To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the borough.
- 1.14.6 The proposed approach for monitoring the Local Plan, including the Policies and Sustainability Objectives referred to above, is set out in the Crawley Local Plan Monitoring and Implementation Framework, May 2023 (Submission Document Reference: KD/MIF/01). Indicators linked to the Sustainability Objectives referred to above are set out in the table below. Bold text indicates

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(Examination Document Reference: CBC/KD/CS/01k): Initial Regulation 19 Publication Consultation, 2020, pages 32-33; Additional Regulation 19 Publication Consultation, 2021, page 63; and Further Regulation 19 Publication Consultation, 2023, pages 104-102 (with 5818(1)(3)(a) alternative options were suggested through the consultations, the council considered whether these formed reasonable alternatives and whether they were substantially different to those already covered by the options considered.

1.17 Question 1.17: Does SA adequately record why alternative options have been discounted?

1.17.1 Appendices F and G to the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) Report, May 2023, pages 188-301 (Submission Document Reference: KD/SA/01) provide extensive tables detailing the full assessment of policy options. The tables set out which is the chosen option and the explanation as to why it was taken. For each option, the analysis against each of the SA Objectives is set out showing the conclusions of the possible impacts. More detailed commentary is provided under each assessment for every option in relation to the reasons behind the assessment of the impacts.

1.17.2 On this basis, Crawley Borough Council believes that the SA adequately records why alternative options have been discounted and why the chosen option has been taken for all of the reasonable alternatives identified and considered by the council.

1.18 Question 1.18: Does the SA (including SEA) adequately address the issue of water neutrality (noting that both Natural England and the Environment Agency have both confirmed at Regulation 19 that they have no concerns regarding the SA/SEA for the Plan)?

1.18.1 The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) May 2023 (Submission Document Reference: KD/SA/01) comprehensively and adequately addresses the issue of water neutrality. It is covered within the document in a number of key places:

- Chapter 6 (pages 37-44)

the authorities have worked together to consider the effects of different policy options before appraising them through

this change, and it is proposed that the buffer zone around the railhead is removed, as set out in the Local Plan Schedule of Suggested Modifications (Submission Document Reference: CBLP/07).

(b) Brick Clay Safeguarding Area

1.20.2 WSCC has advised that it is a requirement under Paragraph 05 (Reference ID: 27-005-20140306) that district councils should show Mineral Safeguarding Areas on their policy maps. Although Crawley is a borough rather than district council, based on the WSCC representation we understand it is applicable to a borough council. Therefore, CBC considers it is appropriate to make the change WSCC suggests, and the council proposes to add the brick clay safeguarding area as set out in the Local Plan Schedule of Suggested Modifications (Submission Document Reference: CBLP/07).

Appendix A: Crawley HRA Technical Note, Lepus Consulting