

Inspectors' Supplementary Questions in response to additional evidence from Crawley Borough Council - 16 November 2023

Introduction

On plan submission the Borough Council indicated that additional evidence would be submitted into the examination. This was clarified in initial exchanges of correspondence between us and the Borough Council in September 2023. We indicated in our initial letter of 20 September 2023 that on receipt of the additional evidence we may issue supplementary questions. This would also enable those who have made related representations at Regulation 19 to respond to the updated evidence prior to the relevant hearing session.

Our Matters Issues and Questions were published on 9 October 2023¹. Since then, the following additional evidence has been submitted and accepted into the examination:

Document

Reference

Matter 10: Transport and Infrastructure

Issue 5 - Updated evidence on Transport and Infrastructure Delivery

In respect of the DfT Circular 01/22 Checklist we have raised this issue at our MIQ10.1. We have no further specific questions on the submitted checklist and would advise that anyone responding to MIQ10.1 has regard to document CBC.SOCG.15b.

Infrastructure Delivery Schedule - CBC.KD.IP.07

SQ10.34 The Tushmore Roundabout improvements and Hazlewick Avenue/Gatwick Road junction improvements are identified separately as critical schemes for 2025/6 to support the overall Local Plan ~~with~~ funding shortfalls identified (£1.379 million for Tushmore). Is there a reasonable prospect that these schemes will come forward and what are the impacts if they were delayed?

SQ10.35 London Road A23 / Manoro oro oro oro laETQq3ooLoooro oro oro oro /000(sp)

Strategic Flood Risk Assessment Update 2023 PS.ES.EP.17 - Including updated appendices C, D, H & J

Matter 9: Issue 1 – Approach to Environmental Protection

SQ9.7 The SFRA states that Crawley is identified as a 'wet spot' within WSCCs draft Local Flood Risk Management Strategy (2021-26) by reference to surface water flooding and that the Borough is more generally regarded by the Environment Agency and DEFRA as an area with flood risk. Are the development and planning considerations recommended in the updated SFRA appropriately reflected in the submitted Plan?

SQ9.2 Does the updated SFRA, including its application of recent climate change allowances, result in a need to revisit any of the proposed site allocations in the submitted Plan in terms of the sequential test and, where necessary, the exception tests in accordance with the NPPF and the latest iteration of Planning Practice Guidance²?

SQ9.3 Paragraph 12.3 of the SFRA update states: "Inclusion of the SHLAA and Main Employment Areas sites in the SFRA does not imply that development can be permitted without further consideration of the Sequential Test. The required evidence should be prepared as part of a Local Plan Review Sustainability Appraisal or alternatively, it can be demonstrated through a free-standing document, or as part of strategic housing land or employment land availability assessments. NPPF Planning Practice Guidance for Flood Risk and Coastal Change describes how the Sequential Test should be applied in the preparation of a Local Plan Review. The assessments undertaken for this SFRA will assist Crawley Borough and Horsham District Councils in the preparation of the Sequential Test." Does the Sustainability Appraisal require revisiting to take account of the updated SFRA and ensuring that the Sequential Test is satisfied?

² 'Flood Risk and Coastal Change' updated 25 August 2022