



Crawley 2035

<p>Ref No:</p> <p><i>Office use only</i></p>
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Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council by 5pm on 2 March 2020.

Representations can be made via this form and emailed to forward.planning@crawley.gov.uk or sent via post to: Local Plan Consultation, Strategic Planning, Crawley Borough Council, Town Hall, The Boulevard, Crawley, RH10 1UZ. Alternatively, representations can be made online using the [eform](#) which allows attachments of documents.

This form has two parts:

PART A – Personal details

By law, representations cannot be made anonymously. All representations will be published alongside your name, company name (if applicable), and your client’s name/company (if applicable). The Council will use the information you submit to assist with formulating planning policy.

Further information about Data Protection Rights in line with the provisions of the General Data Protection Regulations and Data Protection Act 2018, for example, how to contact the Data Protection Officer, how long information is held or how we process your personal information can be found at www.crawley.gov.uk/privacy. Specific reference to the Local Plan and planning policy related public consultation can be found on: www.crawley.gov.uk/pw/web/PUB351893

PART B – Your representation

Please fill in a separate sheet for each representation you wish to make. You may submit multiple “PART B” sections with a single “PART A” completed.

PART A – Personal details

Please ensure that you complete all fields in 1. If a planning agent is appointed, please enter the Title, Name and Organisation in 1, and complete the full contact details of the agent in 2.

	1. Personal details	2. Agent’s details
Title:	Mr	
First name:	Kevin	
Surname:	Bown	
Organisation:	Highways England	
Address line 1:	Bridge House	

Address line 2: Walnut Tree Close

Town/city: Guildford

Postcode: GU1 4LZ

Telephone:

Email: PlanningSE@highwaysengland.co.uk

PART B – Your representation

3. Please tick the document that you would like to make a representation on:

- Crawley submission Local Plan
- Crawley submission Local Plan Map
- Crawley submission Sustainability Appraisal
- Habitats Regulation Assessment Screening Report

4. Which part of the Local Plan does this representation relate to?

Paragraph: Policy: Other: LP Generally

5. Do you consider the Local Plan to be: (Please tick)

- 5.1. Legally compliant? Yes No
- 5.2. Sound? Yes No
- 5.3. Compliant with the duty to co-operate? Yes No

6. Please give details explaining your response to 5.1, 5.2, or 5.3 below. Please be as clear as possible.

Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity. We will therefore be concerned with proposals and policies that have the potential to impact the safe and efficient operation of the SRN. With regards to Crawley, the SRN comprises the M23 and A23, with the M25 nearby.

Crawley's Unmet Housing Need/ Developments in Vicinity of Crawley

We note that *“Even with further development within the borough, Crawley will not be able to meet its housing needs in full and possibly not all of its employment needs”*, with a need for 11,280 dwellings (with 5,355 planned for delivery 2020-2035) and 20,541 new jobs. As a result, there is a requirement for neighbouring authorities (especially Horsham, Mid Sussex and Reigate & Banstead) to accommodate Crawley's unmet needs (5,925 dwellings).

It is Highways England's view that in order for the overall Local plan and individual developments to accord with national planning and transport policy full, timely coordination with neighbouring authorities will need to be undertaken in assessing the transport impacts upon the local and strategic road networks. This will especially be the case with regard to the significant development to be sited in neighbouring authorities just outside Crawley's boundaries. The sites include the prospective West of Ifield development with associated Crawley Western Relief or Link Road (as outlined in policy ST4) and Horley Business Park developments. In this respect, we note that para 1.14 states *“Transport Modelling is to be updated taking into account the cumulative impacts of plans, policies and proposals within adjoining authorities”*.

We note that in addition to development just outside the borders of Crawley, there is the prospective expansion Gatwick Airport and/or North Crawley Area Action Plan as outlined in SD3 within the borough.

Transport Evidence Base

We note that the transport evidence base in support of the Local Plan has yet to be prepared, despite the Council consulting on its Reg 19 plan.

We set out our position in June 2019 when consulted on the Infrastructure Plan. It is that because the Local Plan Review involves a change from the current adopted Crawley 2030 Local Plan in terms of the plan years and housing numbers, an updated, robust Transport Assessment will be required.

It should include evidence on the location of strategic development within the borough. Associated with this, and in their own right, the evidence base will require assessments for the M23 Junctions 9 to 11 and along the M23 Spur to Gatwick. This because the model used previously is now unlikely to be suitable for further use.

In this respect, we note that the need for an updated Transport Assessment is acknowledged in Chapter 17, and we have recently been liaising separately with Crawley Borough Council on our input to the transport modelling brief.

We therefore look forward to working with Crawley Borough Council and receiving further information on the transport modelling for review.

Until this Transport Assessment is undertaken and agreed, together with any mitigation required (demonstrated to be in accordance with standards, fully funded and deliverable), Highways England will have no option but to object to the development proposals outlined in the revised Crawley Local Plan 2020-2035.

Assessment of Individual Developments

It should also be noted that all significant developments (even those allocated in the Local Plan), will need to be supported by a robust Transport Assessment (as outlined in policy ST1). In accordance with NPPF and C2/13 Transport Assessment must consider the impact of the development on the Strategic Road Network for the opening year and a future year equivalent to a) 10 years after the application is submitted or b) the end of Local Plan or c) the date at which the whole development is completed, whichever is latest.

Therefore, as things stand at this point in time, we do not consider the Local Plan to be legally compliant, sound or compliant with the duty to co-operate.

However, this is not to say that it cannot be made so (for example, we are content with the Council's current transport base tender document that sets out the required work to be completed), and we look forward to working with the Council and the appointed consultants on the above and any other relevant matters.

If required, please continue your response on an additional piece of paper and securely attach it to this response

- 7. Please set out what modification(s) you consider necessary to resolve the issues you have identified above. You need to state why this modification will make the Local Plan legally compliant or sound. It would be helpful if you are able to suggest how the**

wording of any policy or text should be revised. Please be as clear as possible. Any non-compliance with the duty to co-operate is incapable of modification at examination.

N/A see above.

If required, please continue your response on an additional piece of paper and securely attach it to this response

*Your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations. **After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues s/he identifies for examination.***

8. If your representation is seeking a modification, do you consider it necessary to participate in the public examination hearings? (Please tick)

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

9. If you wish to participate in the public examination hearings, please outline why you consider this to be necessary:


We would wish to participate in the public examination hearings for the following reasons:

- 1) If any of our objections remain unresolved by the time of the examination
- 2) If the Inspector appointed wishes us to attend
- 3) If we need to address matters raised by other supports or objectors.

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the public examination.

If you would like to make a representation on another policy or part of the Local Plan then please complete a separate PART B section of the form or securely attach an additional piece of paper. Copies of the representation form can also be downloaded from the council's website at: www.crawley.gov.uk/crawley2035

Signature

A small white box containing a handwritten signature in black ink, which appears to be the letter 'B'.

Date

2/3/2020