



Crawley

2035

Ref No:

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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

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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: VARIOUS

Other:

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

- | | | |
|---|------------------------------|--|
| 5.1. Legally compliant? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |
| 5.2. Sound? | Yes <input type="checkbox"/> | No <input checked="" type="checkbox"/> |
| 5.3. Compliant with the duty to co-operate? | Yes <input type="checkbox"/> | No <input type="checkbox"/> |

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

PLEASE SEE ATTACHED DETAILED REPRESENTATIONS.

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.**

PLEASE SEE ATTACHED DETAILED REPRESENTATION!

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:

PLEASE SEE ATTACHED DETAILED REPRESENTATIONS

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

deburnett

Date

02.03.2020

Crawley Local Plan 2020-2035

Submission Version – Regulation 19



March 2020

CONTENTS

1	Introduction	2
1.1	Introduction	2
1.2	Context	2
2	National Planning Policy	4
2.1	National Planning Policy Framework.....	4
2.2	Planning Practice Guidance.....	6
3	Legal Requirements	7
3.1	Duty to Cooperate.....	7
3.2	Sustainability Appraisal	8
4	Evidence Base.....	9
4.1	Key Omissions	9
5	Design and Development Requirements	10
5.1	Policy DD2 – Inclusive Design.....	10
6	Housing	11
6.1	Policy H1 – Housing Provision	11
6.2	Policy H4 – Future Housing Mix	12
6.3	Policy H5 – Affordable Housing	12
6.4	Policy H7 – Self and Custom Build.....	12
7	Environmental Sustainability	14
7.1	Policy GI2 – Biodiversity and Net Gain.....	14
8	Conclusion	15
8.1	Tests of Soundness.....	15

1 INTRODUCTION

1.1 Introduction

1.1.1 These representations are submitted by Gladman in response to the current Regulation 19 consultation on the Crawley Local Plan 2035. Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure.

1.1.2 Gladman has considerable experience in the development industry across a number of sectors, including residential and employment development. From that experience, we understand the need for the planning system to provide local communities with the homes and jobs that are needed to ensure that residents have access to a decent home and employment opportunities.

1.1.3 Gladman also has a wealth of experience in contributing to the Development Plan preparation process, having made representations on numerous local planning documents throughout the UK and having participated in many Local Plan public examinations. It is on the basis of that experience that the comments are made in this representation.

1.1.4 Through this submission, Gladman have sought to provide our thoughts on a number of the proposed policies. Gladman submit that the Council will need to carefully consider some of its policy choices and ensure that its evidence base is up-to-date and robust in light of changing circumstances and the changes brought about by the revised National Planning Policy Framework (NPPF) (2019).

1.2 Context

1.2.1 The Crawley Local Plan 2030 was adopted in December 2015 and covers the period up to 2030. The Council are now in the process of preparing a new Local Plan. This new Local Plan will cover the period from 2020 to 2035 (a 15-year period) providing the policy framework and site allocations for this period.

1.2.2 The revised Framework (2019) sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order for the Local Plan to be sound it is fundamental that the Crawley Local Plan Review is:

- **Positively Prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

- **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

2 NATIONAL PLANNING POLICY

2.1 National Planning Policy Framework

2.1.1 On 24th July 2018, the Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications form the first revisions of the Framework since 2012 and implement changes that have been informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

2.1.2 The revised Framework (2019) introduces a number of major changes to national policy and provides further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. Paragraph 16 of the Framework (2019) states that Plans should:

- a) *Be prepared with the objective of contributing to the achievement of sustainable development;*
- b) *Be prepared positively, in a way that is aspirational but deliverable;*
- c) *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d) *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e) *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f) *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).*

2.1.3 To support the Government’s continued objective of significantly boosting the supply of homes, it is important that the Local Plan Review provides a sufficient amount and variety of land that can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay¹.

¹ NPPF – Paragraph 60

- 2.1.4 To be considered sound at Examination the Local Plan Review will need to meet all four of the soundness tests set out in paragraph 35 of the Framework (2019).
- 2.1.5 To support the Government’s continued objective of significantly boosting the supply of new homes, it is important that the Local Plan provides a sufficient amount and variety of land that can come forward without delay where it is needed to meet housing needs.
- 2.1.6 In determining the minimum number of the amount of homes needed, strategic plans should be based upon a local housing needs assessment, defined using the standard method unless there are exceptional circumstances to justify an alternative approach.
- 2.1.7 Once the minimum number of homes that is required has been defined, Paragraph 67 of NPPF 2019 requires a Local Planning Authority to have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment (SHLAA). This assessment should be used to identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability. Paragraph 67 requires a supply of:
- a) Specific, deliverable sites for years one to five of the plan period; and
 - b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.
- 2.1.8 Annex 2 of NPPF 2019, provides updated definitions for the terms ‘deliverable’ and ‘developable’. These are:

‘To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) Sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).***
- b) Where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.’***

‘To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.’

- 2.1.9 Local Authorities are required to meet the assessed housing need as defined by the Standard Method as a **minimum**, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see Paragraph 35 of the NPPF 2019).
- 2.1.10 Securing the full and timely delivery of housing is a key objective of NPPF 2019. Paragraph 73 of NPPF 2019 confirms the need for local planning authorities to identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing. This should include a 5%, 10% or 20% buffer to the five-year supply depending on local circumstances.
- 2.1.11 The NPPF 2019 introduces the need for local planning authorities to ensure that housing delivery is maintained in alignment with the minimum requirements of the Plan over the duration of the plan period. The Housing Delivery Test provides a measure of how many homes are delivered in an authority over a rolling 3-year period in contrast to its housing requirement or need. Where delivery falls below specific thresholds of the housing requirement, the Housing Delivery Test identifies specific actions or consequences required to be implemented to strengthen the future supply.

2.2 Planning Practice Guidance

- 2.2.1 The Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018. The updated PPG provides further clarity on how specific elements of the revised Framework should be interpreted when preparing Local Plans. This Crawley Local Plan will need to follow this additional guidance.

3 LEGAL REQUIREMENTS

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate (DtC) is a legal requirement established through section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. The DtC requires local planning authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues through the process of ongoing engagement and collaboration.²
- 3.1.2 The Framework (2019) has introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SOCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist. The Framework (2019) sets out that local planning authorities should produce, maintain, and update one or more Statement(s) of Common Ground (SOCG), throughout the plan making process³. The SOCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to ensure issues are proactively dealt with e.g. unmet housing needs.
- 3.1.3 The preparation of a SOCG will be of particular importance for Crawley District with regards their relationship with the both Horsham and Mid Sussex and in particular the issue of unmet housing needs and where these are to be accommodated.
- 3.1.4 Gladman have been unable to find within the Council's evidence base any Duty to Cooperate Statement or SOCG regarding these matters. Whilst it is noted that the Council and its neighbouring authorities have in the past worked together regarding housing needs across the HMA and specifically the delivery of unmet needs from Crawley, it is still of fundamental importance that the necessary statements regarding cross boundary working are prepared and published. These statements would help to clarify the position of both Horsham Borough Council and Mid Sussex District Council regarding unmet housing needs.
- 3.1.5 As noted above these SOCG should have been prepared and updated throughout the plan preparation and should have been made publicly available. Gladman reserve the right to provide further comments on the DtC and in particular the cross-boundary issues of delivering unmet housing need once these documents have been published.

² PPG Reference ID: 61-021-20180913

³ PPG Reference ID: 61-001-20180913

- 3.1.6 As demonstrated by the outcome of the examination of the St Albans Local Plan in 2017, if a Council fails to satisfactorily discharge its statutory duty to engage in the DTC, a Planning Inspector must recommend non-adoption of the Plan. This legal test cannot be retrospectively rectified with modifications to the plan.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the Planning and Compulsory Purchase Act 2004, policies set out in Local Plans must be subject to a Sustainability Appraisal (SA), and also incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (the SEA regulations).
- 3.2.2 The SA/SEA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the emerging Local Plan proposals on sustainable development when judged against all reasonable alternatives. The Council should ensure that the future results of the SA clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of this assessment why some policy options have progressed, and others have been rejected. This must be undertaken through a comparative and equal assessment of each reasonable alternative, in the same level of detail for both chosen and rejected alternatives. The Council's decision-making and scoring should be robust, justified and transparent.

4 EVIDENCE BASE

4.1 Key Omissions

- 4.1.1 Having reviewed the Council’s evidence base, Gladman highlight significant concerns regarding the absence of a number of key documents (including a Viability Assessment and SOCGs). These documents should have been used to inform the preparation of the Local Plan review. Whilst the Council has acknowledged that various documents are not yet available and will be published in due course, Gladman consider this unsatisfactory, as it restricts the ability to provide informed representations having reviewed the evidence base supporting the proposed policies.
- 4.1.2 Concerns regarding the lack of published information on the DtC and specifically the issues of accommodating the Council’s unmet housing needs in Horsham and Mid Sussex have been raised in previous sections of this submission. Gladman recommend that this information through SOCGs is published as soon as possible.
- 4.1.3 With regards to the lack of viability evidence, Gladman consider this to also be a critical omission, particularly given the change of approach through the 2019 version of the NPPF, whereby it is now expected that development viability should be resolved through the local plan and not at the planning application stage. This position is also clearly set out in the PPG, Gladman refer to paragraph ID10-002-20190509 which states:
- “The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine the deliverability of the plan. It is the responsibility of plan makers in collaboration with the local community, developers and other stakeholders, to create realistic, deliverable policies.”*
- 4.1.4 Gladman submit that the Council should have prepared the Viability Assessment to inform the preparation of the plan, to ensure that the cumulative impact of the proposed policies do not place such additional burdens on development which as a result render them unviable.

5 DESIGN AND DEVELOPMENT REQUIREMENTS

5.1 Policy DD2 – Inclusive Design

5.1.1 Strategic Policy DD2 relates to standards for accessible and inclusive design. This policy requires that all new development should be in accordance with the optional Buildings Regulation M4(2) 'accessible and adaptable dwellings' and that 5% of dwellings on major development schemes should be built to M4(3) 'Wheelchair user dwellings'. The policy provides an element of flexibility in that it sets out that in exceptional circumstances, flexibility to these policy requirements may be applied, providing the development meets certain criteria.

5.1.2 With regards to the optional technical standards for accessible and adaptable homes, if the Council wish to include a policy in the Local Plan adopting any of these optional standards, M4(2) and M4(3), which policy DD2 seeks to do, then this should only be done in accordance with the NPPF (2019) specifically paragraph 127.f, footnote 46 and also the guidance contained in the PPG.

5.1.3 Footnote 46 states *"planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties."* Any such policies would need to be based on relevant and up to date evidence regarding identified need in order to justify specific policy requirements.

5.1.4 Gladman refer to the PPG which sets out the evidence necessary to justify a policy requirement for M4(2) and M4(3). Specifically, paragraph ID 56-007 which states: *"There is a wide range of published official statistics and factors which local planning authorities can consider and take into account, including:*

- *The likely future need for housing for older and disabled people (including wheelchair user dwellings).*
- *Size, location, type and quality of dwellings needed to meet specifically evidenced needs (for example retirement homes or care homes).*
- *The accessibility and adaptability of existing housing stock.*
- *How needs vary across different housing tenures.*
- *The overall impact on viability."* (ID: 56-007-20150327)

5.1.5 The Council will need to be able to demonstrate through robust up to date evidence the need for these policy requirements. Gladman are unclear whether there is sufficient evidence to demonstrate the need for all new dwellings to be M4(2) and the basis for the requirement for 5% of dwellings to be built to M4(3).

6 HOUSING

6.1 Policy H1 – Housing Provision

6.1.1 Policy H1 outlines that the Local Plan makes provision for the development of a minimum of 5,355 net dwellings in the borough in the period 2020 to 2035. The Council are proposing a stepped requirement over the course of the plan period as follows:

- Years 1-5 (2020-2025): 500 dpa
- Years 6-10 (2025-30): 450 dpa
- Years 11-15 (2030 – 35): 121 dpa

6.1.2 Policy H1 outlines that there will be a remaining unmet housing need of approximately 5,925 dwellings over the Plan period. The policy then explains how the Council will continue to work closely with its neighbouring authorities, particularly those which form the North West Sussex Housing Market Area.

6.1.3 Gladman are supportive of the 5,255 new dwelling requirement being expressed as a minimum figure and the Council setting out what they consider the scale of the unmet needs to be. It will be for the Council to clearly demonstrate the capacity within the borough and therefore provide the evidential justification for the scale of unmet need.

6.1.4 Whilst Gladman note that 3,150 homes have been identified to deliver an element of Crawley's unmet needs in the neighbouring authorities of Horsham and Mid Sussex, these unmet needs are changing since the adopted Local Plans and Gladman are unaware of any recent SOCGs between the three authorities regarding how this unmet need will be met. As outlined earlier in this submission these statements are critical for the Local Plan Review and should be in place prior to submission of the Plan.

6.1.5 Gladman reserve the right to comment further on the housing needs of Crawley once the SOCGs with Horsham and Mid Sussex have been published. Gladman note that Horsham District Council are currently consulting on their Regulation 18 version of the Local Plan within which three options regarding housing delivery are presented for comments. The first options seeks to only deliver housing to meet the identified needs of Horsham, whereas the second and third options include delivery to meet an element of unmet housing needs arising from Crawley.

6.1.6 Gladman submit that further certainty is required regarding the delivery of the unmet housing needs across the HMA to ensure that the Local Plan is both effective and positively prepared.

6.2 Policy H4 – Future Housing Mix

6.2.1 Policy H4 provides the proposed policy approach to housing mix. Gladman support the flexibility provided through this policy which, whilst referring to a recommended housing mix set out in the table below the policy, recognises that the appropriate mix will have to be determined on a site by site bases and will be dependent on the size and characteristics of the site as well as the viability of the scheme.

6.2.2 Gladman submit that flexibility such as this is necessary within the policy to enable developers to provide a mix of housing on site which reflect local need at that particular time based on up to date evidence. The SHMA only provides evidence from a snapshot in time and therefore will not necessarily be an appropriate indication of housing needs later in the plan period.

6.3 Policy H5 – Affordable Housing

6.3.1 Policy H5 outlines that 40% affordable housing will be required from all residential developments. Gladman reserve the right to comment on the affordable housing percentage requirement once the viability work has been published as this should test the appropriateness of this percentage requirement in Crawley.

6.3.2 Gladman note that the affordable housing requirement is in relation to all residential development. Gladman do not consider this approach to be justified or consistent with national policy. In this regard, Gladman refer to paragraph 63 of the NPPF(2019) which states: *“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural area (where policies may set out a lower threshold of 5 units or fewer)...”*

6.3.3 The approach set out in Policy H5 requires small sites of less than 10 units to make a financial contribution towards affordable housing.

6.3.4 The Council expects a minimum of 75% of the affordable housing to be Affordable Rent or Social Rent, and up to 25% Intermediate and/or Affordable Home Ownership tenure. Gladman recommend that this proposed tenure split should be provided as guidance rather than a rigid requirement. Flexibility is needed to ensure that if necessary, the developer and Council can negotiate over the appropriate mix for a scheme, due to site specifics and local need.

6.3.5 It is important to remember that the evidence provided through the SHMA only provides a snapshot in time and therefore flexibility in the approach provided regarding the affordable housing tenure is required. It is also important that the affordable housing requirement, including the proposed tenure split, is tested through the viability study and found to be viable.

6.4 Policy H7 – Self and Custom Build

6.4.1 Policy H7 provides the proposed approach to the delivery of self-build and custom build housing in Crawley. This outlines a requirement for sites over 50 to set aside 6% of the total area of the site to

provide serviced plots for self-build and custom build housing. Gladman are unclear of the justification for this specific level of requirement and also query the appropriateness of requiring self-build provision as part of large-scale development sites. The demand for self-build plots may be for individual plots in more rural locations.

6.4.2 Whilst Gladman are supportive of the Local Plan including a policy encouraging the provision of self-build, when setting a specific requirement for strategic sites to meet, there does still need to be evidence of local demand for this type of housing, therefore it is important that the policy contains a reference to the need for appropriate demand being identified in relation to these large sites.

6.4.3 Gladman note and support the inclusion a mechanism whereby if the self-build and custom-build plots are not brought forward within a given timeframe (in this case marketed for 12 months) that the plots revert back to market housing as part of the wider scheme so that it does not unnecessarily restrict the delivery of much needed housing.

7 ENVIRONMENTAL SUSTAINABILITY

7.1 Policy GI2 – Biodiversity and Net Gain

7.1.1 Policy GI2 outlines that *“Development will be required to demonstrate how it will meet the government’s requirement for securing a ‘net gain’ in biodiversity. As a minimum, all development proposals will need to achieve a net gain for biodiversity in accordance with government expectations currently a 10% increase in habitat value for wildlife compared with the pre-development baseline.”*

7.1.2 Gladman note that whilst this is the Government’s current position there is no certainty as yet as to the final level of net gain that will be required nor the basis for calculating this. Gladman recommend that this policy should be amended to refer to ‘should ensure net gains for biodiversity’, with the exclusion of any specific percentage increase.

7.1.3 With regards to achieving net gains in biodiversity, Gladman submit that it is important to consider the long term impacts when reviewing proposals for biodiversity net gain taking into account that many of the measures provided as part of the development will need to mature beyond the build period.

7.1.4 Gladman also submit that if off-site mitigation provides the best opportunity for biodiversity gain, then the Local Plan policy should be flexible enough to allow for this and it should not be ruled out from the planning application process.

8 CONCLUSION

8.1 Tests of Soundness

8.1.1 Gladman welcome the opportunity to comment on the Crawley Local Plan Submission Version and hope that these representations are found to be constructive. Gladman request to be added to the consultation database and updated on any future public consultations for the Crawley Local Plan Review.

8.1.2 For the Local Plan to be found sound at examination it must be able to meet the four tests of soundness as required by paragraph 35 of the Framework. These tests are outlined as follows:

- **Positively prepared** – provide a strategy which, as a minimum seeks to meet the areas objectively assessed needs and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking account the reasonable alternatives based on proportionate evidence;
- **Effective** – deliverable over the plan period, and based on effective joint working on cross boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework.

8.1.3 Gladman have provided comments on a number of the proposed policies within the Local Plan and believe that these need considering and addressing in order for the plan to be found sound at examination.

8.1.4 Gladman also request that the necessary evidence base documents are made publicly available as soon as possible and recommend that an addition stage of public consultation is undertaken with regards to these and the impacts that they may have on the submission version of the Local Plan.