



Crawley 2035

Ref No:

Office use only

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:	Mrs	
First name:	Tracey	
Surname:	Flitcroft	
Organisation:	West Sussex County Council	
Address line 1:	WSCC Northleigh	

Address line 2:	County Hall	
Town/city:	Chichester	
Postcode:	PO19 1RH	
Telephone:	0330 2229484	
Email:	tracey.flitcroft@westsussex.gov.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:	All Plan
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5. Do you consider the Local Plan to be: (Please tick)

- | | | | | |
|---|-----|-------------------------------------|----|-------------------------------------|
| 5.1. Legally compliant? | Yes | <input checked="" 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 checked="" 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.

In the County Council's response to the consultation on the draft Crawley Local Plan Review (Reg 18) the Borough Council was advised to develop a transport evidence base to assess the impacts of development on the transport network and identify mitigation measures.

Significant new development is planned through the employment and housing policies:

- EC1: Sustainable Economic Growth;
- EC3: Office Provision;
- H1 Housing Provision; and
- H2: Key Housing Sites

At present, there is no transport evidence base to support these proposals. Transport study work is about to be commissioned (February 2020) with technical support from the County Council. This work is required to demonstrate the impact of the proposed development on the transport network and the transport measures required to demonstrate compliance with paragraphs 102 to 111 of the National Planning Policy Framework, with particular reference to paragraphs 108 and 109 shown below:

“Considering development proposals

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;
- b) safe and suitable access to the site can be achieved for all users; and
- c) any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.”

As such the completion of the transport study work and agreement of a viable and deliverable strategy for mitigation is fundamental to successfully demonstrating the soundness of the Plan.

As this piece of work has not yet started it is not yet known what the total trip generation of the proposed site allocation will be, or how the resulting travel demand will be distributed across the highway and public transport networks. It is common practice for this evidence to have been completed prior to the Regulation 19 Consultation. As it has not been completed it is important to stress that it is crucial that the study is completed prior to Plan Submission, as the County Council cannot consider the plan to be sound until:

- the impact of the housing and employment allocations is identified in scale and location; and
- a transport strategy for sustainable transport (led) and highway solutions to mitigate impacts to capacity, safety and environment has been designed and is demonstrated to be;
 - effective;
 - fully and reliably costed;
 - affordable; and
 - without barriers to delivery which may not be overcome.

The brief for the Transport Study, which has been agreed between the Borough Council, County Council and Highways England is considered to be a sound basis to allow the study to achieve this position. The County Council will continue to provide technical advice to support this work and offer assistance as necessary to address the soundness of the Plan. However, given that this work is expected to take several months during which outcomes will remain uncertain, the County Council objects to the housing and employment allocations in the Plan until such time as the transport evidence base and resulting transport strategy is completed and agreed to the Council’s satisfaction.

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.**

As outlined above, the Plan cannot be considered sound until the Transport Study has been completed. We will, however, continue to provide technical advice to support this work and offer assistance as necessary to address the soundness of the Plan.

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:

The County Council will continue to provide technical advice to support work on the Transport Study and offer assistance as necessary to address the soundness of the Plan. However, the completion of the transport study work and agreement of a viable and deliverable strategy for mitigation is fundamental to successfully demonstrating the soundness of the Plan. As Highways Authority, WSCC's attendance at the Hearings is considered necessary.

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

T Flitcroft

Date

2 March 2020

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:

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

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

Policy IN2 The Location and Provision of New Infrastructure: It should be noted, demand for education provision in Crawley has increased in recent years. A free school (under Wave12) for secondary education has been authorised. Sites are being investigated, however, there is difficulty in finding a site. The new school is necessary to fulfil current demand and it is expected to provide further capacity in the area.

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.

If, for whatever reason, the Free School is not delivered, there will be an impact on education provision to serve any additional housing development within the Borough within the plan period and an alternative secondary school site(s) will need to be found to serve both current and future secondary demand.

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

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

Paragraph: 3.6 – 17

Policy: SD2

Other:

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.

West Sussex County Council have worked with Crawley Council to develop their “Enabling Healthy Lifestyles and Wellbeing” Policy SD2. WSCC’s Public Health Team formally support Policy SD2 and any other policies supporting and looking to increase health and wellbeing in the area.

In addition, we formally support the requirement from developers to complete Health Impact Assessments (HIA) as a ‘must’ have requirement to mitigate negative impacts and unintended consequences as a result of development that may have an impact on increasing health inequalities especially in regards to our most vulnerable population groups. This offer of support is in line with the West Sussex County Council’s Public Health’s position which is to:

- Recommend that a health impact assessment (HIA) is undertaken for all major plans, policies and development proposals across West Sussex

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

Paragraph: 8.16 – 8.23

Policy: IN3

Other:

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.

West Sussex County Council have worked with Crawley Borough Council to develop their Policy INF3. WSCC encourage Crawley Borough Council's ambition ensure coverage of gigabit-capable full fibre infrastructure, which is in line with the government's target for all premises to be able to access gigabit speeds by 2025.

WSCC strongly supports that planning authorities hold policies that prioritise how, in making planning deliberations, they ensure developers make provision for gigabit-capable full fibre network and welcomes Policy IN3 in ensuring all development - residential, employment and commercial - is future ready.

We appreciate that reference is particularly made to '*gigabit-capable full fibre infrastructure*' in order to provide future-proofed broadband services and to support the delivery of future technologies.

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Paragraph:

Policy:

Other:

Infrastructure
Plan

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

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These comments relate to the Infrastructure Plan – for information

Page 14 ‘Current Findings’ seventh bullet: should be amended to reflect the expansion of Ifield Community by 1FE from 2020 and so lowering the overall demand

- A site for a ~~8-10~~ 6-8 FE secondary is therefore required going forward. Due to the lack of an identified site in Crawley

Transport – Road (page 32) Evidence base: reference to the signalisation of Bewbush Manor Roundabout is not mentioned in this section

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Signature

Date

T Flitcroft

2 March 2020

WSCC Officer response to the Crawley 2035 Submission Draft Local Plan Regulation 19 Consultation

This note sets out officer comments upon the proposed submission documents, highlighting key issues and suggesting changes which the County Council is requesting be made to the Local Plan prior to adoption by Crawley Borough Council.

Transport objection to the Submission Draft Local Plan on the grounds that it has not been 'Positively Prepared' and 'Consistent with national policy'. WSCC would wish to participate in the examination hearings.

In the County Council's response to the consultation on the draft Crawley Local Plan Review (Reg 18) the Borough Council was advised to develop a transport evidence base to assess the impacts of development on the transport network and identify mitigation measures.

Significant new development is planned through the employment and housing policies:

- • EC1: Sustainable Economic Growth;
- • EC3: Office Provision;
- • H1 Housing Provision; and
- • H2: Key Housing Sites

At present, there is no transport evidence base to support these proposals. Transport study work is about to be commissioned (February 2020) with technical support from the County Council. This work is required to demonstrate the impact of the proposed development on the transport network and the transport measures required to demonstrate compliance with paragraphs 102 to 111 of the National Planning Policy Framework, with particular reference to paragraphs 108 and 109 shown below:

"Considering development proposals

108. In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
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109. Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe."

As such the completion of the transport study work and agreement of a viable and deliverable strategy for mitigation is fundamental to successfully demonstrating the soundness of the Plan.

As this piece of work has not yet started it is not yet known what the total trip generation of the proposed site allocation will be, or how the resulting travel demand will be distributed across the highway and public transport networks. It is common practice for this evidence to have been completed prior to the Regulation 19 Consultation. As it has not been completed it is important to stress that it is crucial that the study is completed prior to Plan Submission, as the County Council cannot consider the plan to be sound until:

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- a transport strategy for sustainable transport (led) and highway solutions to mitigate impacts to capacity, safety and environment has been designed and is demonstrated to be;
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 - without barriers to delivery which may not be overcome.

The brief for the Transport Study, which has been agreed between the Borough Council, County Council and Highways England is considered to be a sound basis to allow the study to achieve this position. The County Council will continue to provide technical advice to support this work and offer assistance as necessary to address the soundness of the Plan. However, given that this work is expected to take several months during which outcomes will remain uncertain, the County Council objects to the housing and employment allocations in the Plan until such time as the transport evidence base and resulting transport strategy is completed and agreed to the Council's satisfaction.

Additional Comments -potential minor modification:

Policy IN2 The Location and Provision of New Infrastructure: It should be noted, demand for education provision in Crawley has increased in recent years. A free school (under Wave12) for secondary education has been authorised. Sites are being investigated, however, there is difficulty in finding a site. The new school is necessary to fulfil current demand and it is expected to provide further capacity in the area. If, for whatever reason, the Free School is not delivered, there will be an impact on education provision to serve any additional housing development within the Borough within the plan period and an alternative secondary school site(s) will need to be found to serve both current and future secondary demand.

Infrastructure Plan Comments:

Page 14 'Current Findings' seventh bullet: should be amended to reflect the expansion of Ifield Community by 1FE from 2020 and so lowering the overall demand

- A site for a ~~8-10~~ **6-8** FE secondary is therefore required going forward. Due to the lack of an identified site in Crawley

Transport – Road (page 32) Evidence base: reference to the signalisation of Bewbush Manor Roundabout is not mentioned in this section.