



# Crawley

Local Plan

<b>Ref No:</b>          <i>Office use only</i>
--

## Crawley Submission draft Local Plan Representation

Please return your completed representation form to Crawley Borough Council.

Representations can be made via this form and emailed to [strategic.planning@crawley.gov.uk](mailto:strategic.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](http://www.crawley.gov.uk/privacy). Specific reference to the Local Plan and planning policy related public consultation can be found [here](#).

### 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:	<input type="text"/>	<input type="text"/>
First name:	<input type="text"/>	<input type="text"/>
Surname:	<input type="text"/>	<input type="text"/>
Organisation:	<input type="text" value="Sussex Ornithological Society"/>	<input type="text"/>
Address line 1:	<input type="text"/>	<input type="text"/>

Address line 2:	<input type="text"/>	<input type="text"/>
Town/city:	<input type="text"/>	<input type="text"/>
Postcode:	<input type="text"/>	<input type="text"/>
Telephone:	<input type="text"/>	<input type="text"/>
Email:	conservation@sos.org.uk	<input type="text"/>

## 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:	<input type="text"/>	Policy:	<input type="text"/>	Other:	<input type="text" value="General comment"/>
------------	----------------------	---------	----------------------	--------	--

### 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 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.

Our representation is contained in our letter dated 17<sup>th</sup> April and submitted by email. A further copy is enclosed.

*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 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 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/localplanreview](http://www.crawley.gov.uk/localplanreview)

**Signature**

**Date**

20042021



# SUSSEX ORNITHOLOGICAL SOCIETY

Registered charity 256936

www.sos.org.uk



17<sup>th</sup> April 2021

By e-mail only

[strategic.planning@ Crawley.gov.uk](mailto:strategic.planning@ Crawley.gov.uk)

Dear Sir or Madam

## **RESPONSE TO CRAWLEY LOCAL PLAN S.19 SUBMISSION DRAFT**

We have examined the Regulation 19 Submission Draft of the Crawley Local Plan, and in broad terms we would wish to maintain our position on the comments we made in March 2020 in response to the previous draft. It is understood that these will be forwarded to the Planning Inspector, and unless stated otherwise should still stand.

It remains a matter of concern to the Society that the Council proposes to offload more than 50% of its housing allocation to other authorities, and that this proportion has in fact increased from 53% to 56% since the Regulation 19 Consultation Draft. We feel that, in the light of shifts in Central Government thinking regarding changes to the planning system, and in view of the effects that will follow the current health crisis (particularly the possible long-term brake on aviation growth and the rise in home working and on-line retail making office and retail sites potentially available for housing), Crawley should be more robust in stating that, if the Council is certain that more of these houses cannot be built within Crawley, it is not acceptable to ask neighbouring Local Authorities to build the huge numbers remaining.

It remains a particular concern that there needs to be firmer protection relating to the High Weald AONB, which has not really been addressed in this draft, and regarding which we refer back to our observations in response to the Consultation Draft.

We would like to make the following specific comments in relation to this Submission Draft of the Plan –

### **Housing Policy H1 – Housing Provision**

(a) We note that, while the wording we referred to at 19(b) of our previous submission no longer appears in H1, it is still clearly stated at paragraph 4.14 on page 38 of the Submission Draft in the chapter on Landscape and Form. While we absolutely understand the reasoning behind the statement, we consider that the sheer numbers of houses being off-loaded onto neighbouring Local Authorities renders it unacceptable.

(b) It is noted that the protection for the AONB we requested at 19(c) of our submission has not been included (see comments above).

**Housing Policy H2 – Key Housing Sites**

It is noted that the proposal for 15 houses on land east of Balcombe Road/Street Hill at Pound Hill is still going forward, and would wish to maintain the comments we made in our previous submission with regard to this.

**Strategic Policy H3g – Urban Extensions**

It is a matter of particular regret that this Policy has been deleted altogether, and that the additions we suggested with a view that the AONB should be protected from development have not been included. We would like to see the wording we suggested regarding this at paragraph 21 of our submission be inserted following paragraph 2.33 of the Submission Draft.

**Strategic Policy GI3 – Biodiversity and net gain**

This was Policy GI2 in the Consultation Draft. We would still like to see the wording at 23(a) of our submission included. It looks as though our comment at 23(b) is redundant as the provisions regarding financial contributions appear to have been deleted.

**Strategic Policy ST4 – Search corridor for Crawley Western Relief Road**

We note that little progress has been made regarding this since the Consultation Draft, and the comments we made in our March 2020 response still stand.

We have no further points to raise in regard to the Sustainability Appraisal/Strategic Environmental Assessment, and would like the comments we made in our March submission to go forward.

Yours sincerely,

██████████  
(SOS Conservation Officer)  
██████████