



Crawley Local Plan

<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.

Representations can be made via this form and emailed to 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. 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="Resident 10"/>	<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:	<input type="text"/>	<input type="text"/>

PART B – Your representation

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

- TICKED Crawley submission Local Plan
- TICKED Crawley submission Local Plan Map
- TICKED Crawley submission Sustainability Appraisal
- TICKED 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="All / various"/>
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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 checked="" type="checkbox"/> |

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

5.1 I'm not a lawyer.

5.2 It does not appear sound in respect of the failed duty to cooperate (please see attachment)

5.3 It cannot comply because the duty to cooperate does not work. It doesn't 'do what it says on the tin'. The final sentence in italics of the section 7 heading below is tantamount to an admission of its failure. It merely gives licence to the controlling LPA as more of a 'duty to operate' in spite of whatever might be best for the impacted authority, and in anticipation of this, seeks to absolve the planning process of any further responsibility to exercise any degree of constraint.

The resulting denial of control affecting growth beyond its current built boundary impinges on all aspects of the local plan consultation.

(please see my email of 13.03.2021)

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.

The final sentence of the above heading is a denial of justice, in any sense of the word, in the context of a town whose very existence and growth has derived from its own good planning, being denied any continued leadership in determining its own future shape and direction.

Under these rules any modification seeking to remedy the injustice supported by duty to cooperate would be deemed to be outside the remit of the consultation process.

A Local Plan approved under these circumstances, given insufficient control of land beyond its built-up edges, and without Government concession on this fundamental point will be bad for Crawley and in some important respects, little better or worse than no plan.

(Please see 13.03.20121 email)

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 **TICK**

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

Signature

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Date

18.03.2021

From: [REDACTED]
To: [Strategic Planning](#)
Subject: Local Plan Regulation 19 consultation: SPDs
Date: 27 June 2021 16:21:03

Dear Sir / Madam,

I note that the Draft Crawley Borough Local Plan January 2021 document - while referring in paragraph 1.34 to 'Supporting Guidance Documents' being listed in Appendix C to the draft - does not actually list an Appendix C in the Contents.

I was looking in the draft document for a reference Supplementary Planning Documents, but if Supporting Guidance Documents are something completely different, it may be that an Appendix C would be of no relevance to my query anyway.

I am concerned, however, about the continued tie-in between an adopted new Local Plan Policy Number and a Supplementary Planning Document that might still refer to a 2016 Local Plan Policy reference. For example, unless the Green Infrastructure SPD is updated to accord with new policy numbering, an unscrupulous applicant/developer might seek to avoid compliance with BS5837 tree survey and assessment procedures referred to in the current GI SPD on the basis that its CH3 and CH6 policy references are defunct (although they seem to be reincorporated as DD1 and DD4.)

Yours faithfully

[REDACTED]