



Crawley

Local Plan

Ref No:

Office use only

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" value="Mr"/> |
| First name: <input type="text"/> | <input type="text" value="Charles"/> |
| Surname: <input type="text"/> | <input type="text" value="Moran"/> |
| Organisation: <input type="text"/> | <input type="text" value="CMA Planning Ltd"/> |
| Address line 1: <input type="text"/> | <input type="text" value="113 The Timberyard Drysdale Street"/> |

| | | |
|-----------------|--|----------------------------------|
| Address line 2: | <input type="text" value="████████"/> | London |
| Town/city: | <input type="text" value="██████"/> | London |
| Postcode: | <input type="text" value="██████"/> | N1 6ND |
| Telephone: | <input type="text" value="████████"/> <input type="text" value="████████"/> | 07778003554 02077497686 |
| Email: | Charles.moran@cma-planning.co.uk | Charles.moran@cma-planning.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: | <input type="text"/> | Policy: | EC4 – Strategic Employment Allocation (land to the east of Balcombe Road) | Other: | <input type="text"/> |
|------------|----------------------|---------|--|--------|----------------------|

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.

Please see below our client's comments on the proposed policy. In addition to these representations we note that the proposed allocation is a recent addition to the draft Local Plan which we understand has not been subject to previous consultation. Accordingly, we reserve the right to make further representations in due course with particular respect to Sections 19(3) and 19(5) of the Planning and Compulsory Act (2004), and paragraph 35 of the

National Planning Policy Framework (NPPF).

Comments from [REDACTED] in OBJECTION to draft policy / site allocation:

Dear Sir / Madam

This area has been identified as being in the 'Strategic Gap' from 1979 to 2019 maintaining the identity of the settlements.

Whilst Strategic Gaps were not themselves countryside protection policies they have become havens for wildlife supporting deer, foxes rabbits, bank voles, harvest and wood mice, pheasants, bats as well as providing wildlife corridors through the existing field and hedge network. I note that the current Local Plan submission documents justifying the proposed site allocation / policy do not include a Habitats Regulations Assessment (HRA).

In 2016 the Government produced a Parliamentary briefing which recognised that "urban vegetation" is known to improve the quality of local environments, for instance, reducing pollution and noise, and reviewed research into the direct public health benefits of green spaces focussing on mental and physical activity. All this should be protected as a valuable natural resource and should warrant considered attention and as well as on-going protection.

Although the area may no longer have the protection of the 'Strategic Gap', the Government's 2016 briefing should be taken seriously to the quality of life of residence and the small remaining Greenfield's of natural un-developed land in this semi-agricultural landscape and wildlife should be valued for its own sake. Furthermore, the role of this un-developed land and in preserving the separate identities of the settlements remains valid in the context of sustainable development objectives.

Accordingly, in the absence of a robust evidence base, or reasoned justification, for the proposed policy / site allocation it is clear that this element of the Local Plan is unsound in the context of paragraph 35 of the NPPF; fails to comply with Sections 19(3) and 19(5) of the Planning and Compulsory Purchase Act 2004; and the Council's adopted Statement of Consultation.

Your sincerely

[REDACTED]

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 set out above the proposed policy / site allocation is unsound in the context of paragraph 35 of the NPPF and, as such, would need to be removed from 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:

See above. Furthermore, in the context of the significant shortcomings in the proposed policy a failure to allow formal representations / appearance at the Examination stage would render further legal deficiencies in the plan-making process.

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

Date

Mr. Charles Moran of CMA
Planning Ltd

02/02/2021

PART B – Your representation

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

Paragraph:

Policy:

Strategic
Policy EC4:
Strategic
Employment
Location

Other:

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

- 5.1. Legally compliant? Yes No
- 5.2. Sound? Yes No
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Please see below our client's comments on the proposed policy. In addition to these representations we note that the proposed allocation is a recent addition to the draft Local Plan which we understand has not been subject to previous consultation. Accordingly, we reserve the right to make further representations in due course with particular respect to Sections 19(3) and 19(5) of the Planning and Compulsory Act (2004), and paragraph 35 of the National Planning Policy Framework (NPPF).

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Accordingly, in the absence of a robust evidence base, or reasoned justification, for the

proposed policy / site allocation it is clear that this element of the Local Plan is unsound in the context of paragraph 35 of the NPPF; fails to comply with Sections 19(3) and 19(5) of the Planning and Compulsory Purchase Act 2004; and the Council's adopted Statement of Consultation.

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██████████

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- 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.**

For the reasons set out above, the proposed policy / site allocation is considered unsound in its current form and, in the absence of reasoned justification, would need to be removed from the draft Plan in order to meet the relevant tests.

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

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