



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:	Ms	
First name:	Bridget	
Surname:	Fox	
Organisation:	Woodland Trust	
Address line 1:	The Woodland Trust, Kempton Way	

Address line 2:	<input type="text"/>	<input type="text"/>
Town/city:	Grantham, Lincolnshire	<input type="text"/>
Postcode:	NG31 6LL	<input type="text"/>
Telephone:	BridgetFox@woodlandtrust.org.uk	<input type="text"/>
Email:	07787104762	<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:	SD1 Sustainable Development	Other:	<input type="text"/>
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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 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.

We welcome the priority given to Crawley's commitment to being carbon neutral by 2050. We strongly welcome the explicit inclusion of ancient woodland and veteran trees as a protected designation in para 3.4, in line with the NPPF para 175c.

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.

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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:

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Signature

Ms. Bridget Fox

Date

17/02/2021

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

Paragraph:

Policy:

Policy DD1:
Normal
Requirements
of All New
Development

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.

We welcome the policy in g) that existing trees, green spaces and hedges should be integrated, protected and enhanced in new developments, to retain existing trees that contribute positively to the area and allow sufficient space for trees to reach maturity, and the reference to policy DD4 on tree replacement and policy GI3 on biodiversity net gain.

Trees can play a significant aesthetic role helping integrate new developments into existing ones and creating a local identity, and integrating trees and green spaces into developments early on in the design process reduces the risk of tree removal. We recommend the guidance published by the Woodland Trust Residential developments and trees - the importance of trees and green spaces (January 2019).

We welcome the commitment in 5.14 that tree losses through development should be mitigated by new planting, as set out in detail in policy DD4.

However we would like to see the policy strengthened to ensure that development sites play their part in addressing the need to increase tree canopy cover in order to achieve carbon neutrality and sustainable development as set out in Policy SD1.

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We therefore recommend adding that a target for tree canopy cover on development sites be set (the Woodland Trust recommends a 30% target), to be pursued through the retention of important trees, appropriate replacement of trees lost through development, ageing or disease in line with policy DD4, and by new planting to support green infrastructure (policy GI1) and biodiversity net gain (policy GI3).

Further information can be found in the Woodland Trust's Emergency Tree Plan (2020).
<https://www.woodlandtrust.org.uk/publications/2020/01/emergency-tree-plan/>

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

Paragraph:

Policy:

Policy DD4:
Tree
Replacement
Standards

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.

We welcome the clear policy in DD1 in support of tree retention, with removal and replacement as a last resort. We strongly welcome the proposed ratio of tree replacement in policy DD4, which reflects the Woodland Trust's guidance on Local Authority Tree Strategies (July 2016) with a ratio of at least 2:1 for all but the smallest trees and ratios of up to 8:1 for the largest trees.

We strongly welcome the guidance in 5.36 that where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience.

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Paragraph:

Policy:

Policy GI1:
Green
Infrastructure

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.

We welcome this policy, in particular the requirement in section x. that where possible, Natural England's Accessible Natural Green Space Standard recommendations and the Woodland Trust's Woodland Access Standard should be used to assess a development proposal's location in relation to existing accessible natural green space and woodland.

We welcome the requirement in vii. that large development proposals will be required to provide new and/or create links to green infrastructure as well as take into consideration the use of SuDS in line with Policy EP1.

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

Paragraph:

Policy:

Policy GI2:
Biodiversity
Sites

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.

In general we support this policy, but would like to see it strengthened with regard to the buffering of ancient woodland in order to be sound.

We strongly welcome the policy that development resulting in the loss or deterioration of irreplaceable habitats (such as ancient woodland and ancient or veteran trees) should be refused, unless there are wholly exceptional reasons and a suitable compensation strategy exists.

We welcome the policy that if significant harm to biodiversity resulting from development cannot be avoided, adequately mitigated or as last resort compensated then planning permission should be refused.

We welcome the recognition of the unique value of ancient woodland in 14.26 and guidance that a larger buffer may be required for particularly significant engineering operations, or for after-uses that generate significant disturbance.

We strongly welcome the guidance in 14.27 that ancient wood pasture and historic parkland should receive the same consideration as other forms of ancient woodland.

We strongly welcome the guidance in 14.28 that where it is deemed that there is going to be unavoidable residual damage or loss to ancient woodland, the measures taken to compensate for this must be of a scale and quality commensurate with the loss of this irreplaceable habitat, and that where ancient woodland is to be replaced by new woodland, this should aim to create 30 hectares of new woodland for every hectare lost.

We note the policy that a buffer zone between development and ancient woodland will be required in line with Natural England Standing Advice. However, we do not believe this is sufficient.

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

Paragraph:

Policy:

Policy GI3:
Biodiversity
and Net Gain

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.

We welcome the requirement in this policy for at least one new tree, or equivalent soft landscaping, for each new dwelling and that these requirements would normally be expected to be met within the development site.

We note and welcome the guidance in 14.42 that replacement trees (Policy DD4) will not count towards net gain; indeed they may involve a net loss of biodiversity due to the loss of important habitats provided by mature trees, and the potential for new trees to fail.

We strongly welcome the guidance in 14.43 that where possible, UK sourced and grown tree stock should be used to support biodiversity and resilience.

We strongly welcome the guidance in 14.44 that alternatives are proposed on-site in lieu of on-site new tree planting, the planting scheme should be agreed with the council and must be justified on a case-by-case basis, taking into account the multiple benefits provided by trees (including air quality, carbon storage, shading, character, maturity and biodiversity).

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Paragraph:

Policy:

Policy OS2:
Provision of
Open Space
and
Recreational
Facilities

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.

We welcome this policy, in particular the reference in 7.23 to applying Natural England's Accessible Natural Green Space Standard and the Woodland Trust's Woodland Access Standard for accessible natural green space and woodland.

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.

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Paragraph:

Policy:

Policy GAT2:
Safeguarded
Land

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.

The policy should ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.

In particular, we are concerned that the proposed area includes the following ancient semi-natural woodlands (ANSW):

- Allen's Wood ASNW (Grid reference: TQ3003540208)
- Huntsgreen Wood ASNW (Grid reference: TQ2828540024)
- Horleyland Wood ASNW (Grid reference: TQ2898240539)
- Rowley Wood ASNW (Grid reference: TQ2791939226)
- Unnamed ASNW at TQ2955640750

In addition, we are concerned about the proximity of the site to Black Corner Wood ASNW (Grid reference: TQ2996939934).

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 policy should be amended to ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.

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Paragraph:

Policy:

Policy GAT3:
Gatwick
Airport
Related
Parking

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.

We seek clarification of this policy to confirm that any future car parking provision within the airport site would not be allowed in harmful proximity to areas of ancient woodland or veteran trees. As noted in our comments on policy GAT1, the land safeguarded for future airport development includes several areas of ancient semi-natural woodlands (ANSW).

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The policy should be amended to ensure that no areas of ancient woodland or veteran trees are included in this land safeguarded for future airport development.

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Paragraph:

Policy:

Policy H2: Key
Housing Sites

Other:

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- 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.

In line with policy GI2, and the NPPF para 175c, development which would result in the loss of ancient woodland, aged or veteran trees should not be permitted.

In particular, we object to the allocation of land for housing that includes the following ancient semi-natural woodlands (ANSW):

- Black Corner Wood ASNW (Grid reference: TQ2996939934)
- Black Corner Wood ASNW (Grid reference: TQ2980139854)
- Black Corner Wood ASNW (Grid reference: TQ2971939604)
- Titchmeres Wood ASNW (Grid reference: TQ2957539239)
- Forge Wood ASNW (Grid reference: TQ2964738891)
- Unnamed ASNW at TQ2965338714
- Unnamed ASNW at TQ2984538749
- The Birches ASNW (Grid reference: TQ2921138575)
- Tinslow Shaw / Mine Pit Wood ASNW (Grid reference: TQ2901638590)
- Unnamed ASNW at TQ2900238628.

In addition, we are concerned about the proximity of the site allocations to Summersveres Wood (Grid reference: TQ2868538572) and to Tilgate Forest & Lodge ASNW (Grid reference: TQ2704334553).

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.

We urge safeguarding these irreplaceable areas of woodland by excluding them from any future development sites, with an appropriate buffer. We recognise the intense pressure to identify and bring forward new sites for housing and employment uses. This pressure makes it all the more important that vital protections for ancient woodland and veteran trees are upheld.

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

Signature

Ms. Bridget Fox

Date

17/02/2021

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:

Policy ST4:
Safeguarding
of a Search
Corridor for a
Crawley
Western Link
Road

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.

We welcome the confirmation in 17.25 that new highways crossing the Ifield Brook Meadows and Rusper Road Playing Fields Local Greenspace would be wholly unacceptable, given the impact this would have on ancient woodland. However, we are concerned that the search area for the proposed link road still includes ancient woodland at Rowley Wood ASNW (grid reference: TQ2791939226).

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.

We propose modifying the policy to expand the criterion "local biodiversity" under ST4 a) adding the words "and protected biodiversity sites" so that the policy reads: "The design and route of the Western Link Road must take account of a. its impact on (but not limited to): local biodiversity and protected biodiversity sites..." This would better reflect local plan Policy G12.

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

Signature

Date

Ms. Bridget Fox

17/02/2021