

Crawley

Local Plan

Crawley Borough Local Plan Examination

Crawley Borough Council Response to Inspectors' Matters, Issues and Questions

Matter 2: Spatial Strategy

November 2023



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Contents

| | |
|--|----|
| Issue 1: Whether the Spatial Strategy is sound. | 5 |
| 2.1 Question 2.1: Given the significant level of unmet housing need, which remains to be positively accounted for, is the proposed spatial strategy for Crawley soundly based? .. | 5 |
| Scenario 3: A Crawley Borough Focus | 5 |
| Scenario 2: A Sub Regional Focus | 6 |
| 2.2 Question 2.2: Are there any reasonable alternative spatial strategies for the Borough that could result in a material difference in respect of the level of unmet housing need? 7 | |
| 2.3 Question 2.3: Representations on the plan suggest that comprehensive estate regeneration within the town could yield additional homes. Is that a reasonable alternative strategy within the plan period?..... | 8 |
| 2.4 Question 2.4: Gatwick Airport and operational activities in support of the airport is clearly a key part of any spatial strategy for the Borough. In general terms, safeguarded land for the airport (under Policy GAT2) applies to the remaining tracts of undeveloped land within the Borough. If the extent of safeguarded land was not necessary or was not found to be sound as part of this examination, would that necessarily result in a different spatial strategy, especially in terms of options to meeting housing needs? Would it be premature to conclude on that now or are there known principles (such as noise levels) which mean safeguarding has limited bearing on a spatial strategy to meet housing needs in the Borough? | 9 |
| Issue 2: Whether the Plan is justified and effective in relation to the prospect of development adjacent to Crawley. | 10 |
| 2.5 Question 2.5: Is the plan sufficiently flexible and sensitive to potential options for growth ‘At Crawley’ that may occur in Horsham and Mid Sussex districts? Would plan review be an appropriate mechanism if strategic growth around Crawley was determined to be a sound spatial strategy for neighbouring authorities? | 10 |
| 2.6 Question 2.6: Is the proposed content in the Plan at paragraph 12.23 on the circumstances where development proposals adjacent to Crawley will be supported justified? Will it be effective in influencing spatial strategies or adjoining development proposals at either the plan preparation or decision-making stages in neighbouring authorities?..... | 12 |
| 2.7 Question 2.7: Is paragraph 12.23 justified at point (ii) in seeking/requiring the completion of a Western Link prior to the (first) completion of dwellings? Is that supported by the available evidence base? | 13 |
| 2.8 Question 2.8: Does criterion xi) at paragraph 12.23 need to be amended to ensure consistency with national planning policy at NPPF paragraph 180c) which caveats the loss or deterioration of irreplaceable habitats with “unless there are wholly exceptional reasons, and a suitable compensation strategy exists”? | 15 |
| Issue 3: Whether Policies SD1 and SD2 in terms of over-arching policies for sustainable development are sound. | 15 |

2.9 Question 2.9: Are the strategic objectives in Strategic Policy SD1 reflective of the spatial issues and priorities identified during the preparation of the plan including the sustainability appraisal baseline and the sustainability objectives set out at Appendix A of the Plan?15

2.10 Question 2.10: Is Strategic Policy SD2 justified by evidence that health and wellbeing is a particular issue for the Borough? How is the effectiveness of the policy intended to be measured and what is Policy SD2 expected to achieve / contribute towards over the plan period?17

Issue 1: Whether the Spatial Strategy is sound.

2.1 Question 2.1: Given the significant level of unmet housing need, which remains to be positively accounted for, is the proposed spatial strategy for Crawley soundly based?

2.1.1 The proposed spatial strategy for Crawley is soundly based. Crawley Borough Council (CBC) recognises the importance of paragraph 11b of the National Planning Policy Framework (NPPF), page 6 (Post-Submission Document Reference: PS/DS/NPPF/01) which sets the priority for strategic policies to, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole (paragraph 11b)ii.).

2.1.2 The Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) takes this into account and, as a priority, seeks to maximise the quantum of development within the borough.

2.1.3 Crawley's physical land and other constraints on development are summarised in paragraph 12.11, page 157, of the Local Plan in relation to housing supply capacity and set out in Topic Paper 01: Unmet Needs and Duty to Cooperate, May 2023, 2.1.1 (Submission Document Reference: DS/TP/01). These are well known and understood by Crawley's neighbouring authorities as set out in the Duty to Cooperate Statement, July 2023, paragraph 1.3.1, 1.4.2-1.4.5 and 3.1.17 (Submission Document Reference: KD/DtC/01) and were accepted by the Local Plan Inspector for the adopted Local Plan, paragraphs 6-11 (particularly paragraphs 8 and 10) (Submission Document Reference: CBLP/03).

2.1.4 The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), May 2023 (Submission Document Reference: KD/SA/01) Spatial Strategy (Chapter 5, pages 35-36 and Appendix F, pages 192-195) considered the following options:

- Scenario 1: A sub region with a South East regional focus;
- Scenario 2: A sub regional focus;
- Scenario 3: A Crawley Borough focus.

A combination of Scenario 2 and Scenario 3 was chosen. This approach was considered to provide the most realistic and deliverable Local Plan. The chosen options seek to maximise sustainable development opportunities within the borough's administrative boundaries whilst protecting the quality of the environment for local residents, businesses and visitors. Paragraphs 5.10 and 5.11 of the SA/SEA explain the influences and benefits of the combined Scenarios on the Local Plan.

Scenario 3: A Crawley Borough Focus

2.1.5 Critically, Local Plan Policies EC1, EC2, EC3 and EC4 seek to ensure employment development needs are met within the borough's administrative boundaries.

2.1.6 Similarly, every effort is made to optimise and increase housing delivery and meet unmet housing needs. Local Plan Policy H1 confirms that the council will positively consider proposals for the provision of housing to meet local housing needs and sets the supply-led housing requirement as a minimum figure.

- 2.1.7 As set out in the Crawley Borough Council Authority Monitoring Report 1 April 2021 – 31 March 2022 (2021/22 AMR), the borough has consistently exceeded the national Housing Delivery Test (2018: 181%; 2019: 235%; 2020: 252%; 2021: 406%). Whilst the council has some caution over how these are calculated (see council's written response to Matter 3, Issue 1, Question 3.7), the council's own monitoring over the period since the adoption of the Crawley Borough Local Plan, December 2015 (CBLP/02) shows a total cumulative 141% delivery against the Local Plan Policy H1 target. The monitoring and assessment of the delivery over the period since the adoption of the 2015 Local Plan has led to much of the evidence and updating of the strategy as part of the Local Plan Review, in order to identify as accurate, robust and realistic housing supply figure as possible (see the council's written response to Matter 3, Issue 1, Question 3.7).
- 2.1.8 The Local Plan spatial strategy identifies specific areas within the Built-Up Area Boundary which are suited to optimising intensification of existing land use for additional housing. This is reflected in the increased windfall housing numbers, as set out in the Windfall Statement, May 2023 (Submission Document Reference H/HD/06) and the council's response to Matter 3, Issue 1, Questions 3.3 – 3.7.
- 2.1.9 Topic Paper 4: Housing Supply, July 2023 (Submission Document Reference: DS/TP/04) as well as the Crawley Compact Residential Development Study, May 2023 (Submission Document Reference: WC/CLD/01), Chapters 5 and 6, highlight particular potential sources of additional housing supply and tested individual allocated sites to determine optimisation of unit numbers.
- 2.1.10 The Local Plan introduces a series of Housing typology policies (Policies H3, H3a-f). These allow for a greater policy framework for positive planning on the windfall sites which will come forward over the Plan period.
- 2.1.11 In addition, major new windfall opportunities for residential development must meet the Local Plan Strategic Policy CL2 requirements. This includes meeting the expectations of Policies CL3 and CL4 in order to achieve considerably higher density ranges than already exist in the borough, where suitable. In particular, this is considered possible in those locations which can take advantage of, and create, efficiencies in the use of existing accessible services, social, health and infrastructure. This is especially the case in those areas within Crawley which benefit from opportunities to enhance the levels of active and sustainable travel and those which would be in a position to access the District Heat Networks.

Scenario 2: A Sub Regional Focus

- 2.1.12 As re-confirmed by the Strategic Housing Market Assessment, 2019 (SHMA) (Submission Document Reference: H/HN/01), Crawley is located within the Northern West Sussex Housing Market Area. The Duty to Cooperate Statement, July 2023 (Submission Document Reference: KD/DtC/01) demonstrates the extensive discussions and cross-boundary working which takes place among the three main authorities within the same HMA. The Northern West Sussex Housing Needs Statement of Common Ground (Submission Document Reference: SoCG/02) confirms the priority the authorities place on meeting the needs of the HMA within the HMA as far as possible (as determined through each Local Authority's individual independent Local Plan Examination).

- 2.1.13 Whilst the unmet needs arising from Crawley have not been expressly accommodated by any other local authority area at the point of the Crawley Borough Local Plan's Submission, it should be noted that this was the same approach as was taken with the previous adopted Local Plans. In order for Crawley's unmet needs to be considered by other authorities, it is necessary for the level of development needs remaining unmet to be determined through the Crawley Local Plan examination.
- 2.1.14 In addition, without the publication of the Local Plans for Mid Sussex and Horsham Districts, they have not finalised the evidence behind their own understanding of how much development they are able to meet through their site allocations and windfall allowance, nor is it possible for Crawley Borough Council (CBC) to scrutinise fully whether the other authorities within the HMA have done all they can to maximise the development capacity within their areas (for example increasing densities and considering alternative strategic sites).
- 2.1.15 Furthermore, it should be noted that significant development is being proposed on Crawley's boundaries. This has included over 1,200 new dwellings in recent development taken place since adoption of the Crawley Borough Local Plan, December 2015 (Submission Document Reference: CBLP/02) – as set out paragraph 3.1.9 of Topic Paper 1: Unmet Needs and Duty to Cooperate, July 2023 (Submission Document Reference: DS/TP/01). In addition, paragraphs 3.1.10 and 3.1.11 highlight further strategic scale development being promoted on Crawley's administrative boundaries in both Horsham district (West of Ifield – 3,000 dwellings) and Mid Sussex district (Crabbet Park, at least 2,300 dwellings). Even if the neighbouring plans do not meet Crawley unmet needs in numerical terms, the housing is being provided immediately adjacent to Crawley and will in practical terms meet Crawley's needs. This is supported by the advice in the SHMA, paragraphs 5.86-5.89, pages 58-59.
- 2.1.16 Crawley Borough Council did not rely solely on seeking its unmet needs to be met within the HMA. As confirmed in the council's written statement to Matter 1, Issue 1, Question 1.8, and the Duty to Cooperate Statement, Appendix H and Appendix J, in 2020 and 2023, the council wrote to local planning authorities across a wider area than just those within the HMA or those with adjoining administrative boundaries to determine whether any would be able to meet Crawley's unmet development needs. No authority responded with positive confirmation.
- 2.1.17 On this basis, CBC believes it has done everything that can reasonable be expected to seek for its unmet housing needs to be met, both within and outside of the borough's administrative boundaries. As such, the Crawley Borough Local Plan's spatial strategy is soundly based.
- 2.2 [Question 2.2: Are there any reasonable alternative spatial strategies for the Borough that could result in a material difference in respect of the level of unmet housing need?](#)
- 2.2.1 Crawley Borough Council (CBC) do not believe there is any alternative spatial strategy which could result in a material difference in respect of the level of housing need.

- 2.2.2 Scenario 3: A Crawley Borough Focus was considered by the Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA) (Submission Document Reference: KD/SA/01) on its own (pages 194-195). This scenario scored highly on SA Objectives 1, 4, 5 and 7. However, it concluded that it would have potential negative impacts on SA Objectives 2, 3, 6 and 9. The mitigation measures required would mean the strict application of this Scenario would not be physically possible due to the land constraints within the borough, and therefore would still require any unmet need to be accommodated outside of the borough – through Duty to Cooperate and considering a combination approach with Scenario 2.
- 2.2.3 Scenario 1: A Sub Region with a South East Regional Focus would leave a worse situation, with development for Crawley being met further afield from outside the Northern West Sussex Housing Market Area. Strategic discussions take place across wider groupings, as set out in the Duty to Cooperate Statement, such as across the Gatwick Diamond Local Authorities and the West Sussex and Greater Brighton authorities. The Gatwick Diamond work resulted in the Local Strategic Statement, 2016, which provides the strategic context within which the Crawley Borough Local Plan Review commenced. However, due to the different stages of each planning authority's own progress in plan-making and complexities involved in coordination of such large numbers of different authorities, including different county councils and unitary authorities, London Boroughs and a national park, a single strategy across a wider area has not been practicable within the timescales needed for the Crawley Local Plan. In addition, all authorities contacted with a view as to whether they had capacity to meet any of Crawley's unmet development needs responded to confirm they were unable to do so. Therefore, Scenario 1 was discounted from the Spatial Strategy preferred options.
- 2.2.4 The only other approach CBC could have taken would have been to wait for the Local Plans for Mid Sussex and Horsham District Council to be adopted. However, these would have then been undertaken, and their housing requirement set, without having a firm understanding of the unmet housing need arising from within Crawley to be considered as part of their examinations (see paragraphs 2.1.13 and 2.1.14 above in response to Matter 2, Issue 1, Question 2.1).
- 2.2.5 On the basis of the above, CBC strongly contends that the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) takes the most appropriate positive approach it can to its spatial strategy and there are no other reasonable alternative strategies which could have produced an alternative outcome in relation to meeting more of the borough's unmet housing development needs.
- 2.3 [Question 2.3: Representations on the plan suggest that comprehensive estate regeneration within the town could yield additional homes. Is that a reasonable alternative strategy within the plan period?](#)
- 2.3.1 Crawley Borough Council (CBC) has considered the opportunity for comprehensive estate regeneration within the borough. However, at this point it is not sufficiently progressed to build into the Local Plan.
- 2.3.2 Instead, the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) Housing Typology Policy H3a establishes the policy

framework within which to positively consider Estate Regeneration within the borough.

- 2.3.3 However, as set out in Topic Paper 4: Housing Supply (Submission Document Reference: DS/TP/04), and highlighted in the council's response to Matter 3, Issue 1, Question 3.4, whilst early consideration is being given to estate regeneration, the feasibility of this type of development in Crawley is constrained by the fragmentation of property ownership and the complexity of the work required. Such programmes take a long time to implement, and the delivery of any net growth in housing numbers would not occur until the latter part of any scheme which is likely to be beyond the current Plan period.
- 2.3.4 Crucially, waiting for the work required to progress a sufficiently comprehensive Estate Regeneration programme within the borough with certainty would leave the borough without an up-to-date Local Plan and may not result in a successful and demonstrable increase in the borough's housing supply figure. This would be contrary to the government's requirement for maintaining and updating Plans every five years and would leave the borough exposed to speculative development which undermined the other important local planning policies.
- 2.3.5 Notwithstanding this, the possibility of estate regeneration is not discounted as it could come forward as part of monitoring delivery of the Crawley Borough Local Plan through the typology policy. Policy H1 sets a minimum housing delivery figure, so this would not be considered a different strategy. The Crawley Compact Residential Development Study provides the baseline position in setting further consideration of such development during Plan period.
- 2.3.6 In addition, Local Plans are required to be maintained and reviewed to be kept up-to-date, subsequent plans could feasibly include greater detail should any schemes be progressed in the future.
- 2.4 Question 2.4: Gatwick Airport and operational activities in support of the airport is clearly a key part of any spatial strategy for the Borough. In general terms, safeguarded land for the airport (under Policy GAT2) applies to the remaining tracts of undeveloped land within the Borough. If the extent of safeguarded land was not necessary or was not found to be sound as part of this examination, would that necessarily result in a different spatial strategy, especially in terms of options to meeting housing needs? Would it be premature to conclude on that now or are there known principles (such as noise levels) which mean safeguarding has limited bearing on a spatial strategy to meet housing needs in the Borough?
 - 2.4.1 The extent of safeguarded land in the northern part of the borough is a significant constraint on the amount of development which can be planned for in the Local Plan, but removing it would not affect allocations and spatial policies in the remainder of the Plan area, except potentially the strategic employment site allocation.
 - 2.4.2 Should the extent of safeguarded land not be found to be sound as part of this examination and all of the land be removed from safeguarding, Crawley Borough Council (CBC) would take a similar approach to the Area Action Plan approach set

out in CBC's Initial Regulation 19 Consultation document, Crawley 2035: Draft Crawley Borough Local Plan (Submission Document Reference: CBLP/05) Strategic Policy SDC3: North Crawley Area Action Plan. Opportunities within the safeguarded area would be reviewed with the ability for more of Crawley's development needs to be met. The most appropriate locations within the previously safeguarded area to meet housing, employment, infrastructure and other needs, taking account of the noise contours for the main runway for noise sensitive uses, would be assessed alongside any future growth needs of the airport (excluding a southern runway). This would be balanced against the need to protect heritage and environmental assets in the area, including ancient woodland, and take account of constraints such as flooding. The importance of maintaining a visual gap between the edge of Crawley and Gatwick Airport would also be considered.

- 2.4.3 If only part of the safeguarded area was considered not to be necessary, the location of the land removed would determine whether or not it was a suitable location for housing. For example, land to the north of the 60db contour line for the main runway would not be suitable for housing but could be considered for employment sites.

Issue 2: Whether the Plan is justified and effective in relation to the prospect of development adjacent to Crawley.

- 2.5 Question 2.5: Is the plan sufficiently flexible and sensitive to potential options for growth 'At Crawley' that may occur in Horsham and Mid Sussex districts? Would plan review be an appropriate mechanism if strategic growth around Crawley was determined to be a sound spatial strategy for neighbouring authorities?
- 2.5.1 Crawley Borough Council (CBC) has sought to take strategic development 'at Crawley' into account as part of the plan-making for the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01). It is not believed to be necessary for strategic development on the borough's administrative boundaries to trigger a Local Plan review.
- 2.5.2 The Local Plan Reviews have taken place in parallel, with emerging evidence and proposals being shared across the authorities as part of a significant level of joint working, as evidenced in the Duty to Cooperate Statement (Submission Document Reference: KD/DtC/01).
- 2.5.3 It is for the Local Plans of the neighbouring authorities to ensure the impacts of the strategic development, including impacts on Crawley, are appropriately and adequately mitigated in the allocations of these sites. CBC takes part in bilateral discussions with Horsham and Mid Sussex District Council, including with developers promoting sites and with West Sussex County Council, with regard to strategic sites adjacent to Crawley to ensure impacts on Crawley are understood. Opportunities for Crawley's development needs to be addressed through neighbouring development is also being discussed, including for secondary education as set out in the Infrastructure Plan, page 22 (Submission Document Reference: KD/IP/01). The evidence gathered for the Crawley Borough Local Plan sought to take into account

the implications of potential strategic development outside the borough's administrative boundaries "at Crawley". This included:

- Crawley Sustainability Appraisal/Strategic Environmental Assessment, May 2023 (Submission Document Reference: KD/SA/01);
- Crawley Local Plan Habitats Regulations Report, January 2023 (Submission Document Reference: KD/HRA/01);
- the Strategic Housing Market Assessment (SHMA), 2019, paragraphs 5.86-5.89, pages 58-59 (Submission Document Reference: H/HN/01);
- the Crawley Indoor Sport Facilities Assessment, paragraphs 3.27-3.29, pages 43-44, 2021 (Submission Document Reference: WC/OSSR/02);
- the Crawley Local Plan Transport Modelling, Scenario 3, Chapter 4, paragraph 4.1.2, page 31 (Submission Document Reference: ES/ST/01a);
- Crawley Western Link Road Northern Section Area of Search Study (Submission Document Reference: ES/ST/02a);
- the Strategic Flood Risk Assessment, carried out across Crawley and the parts of Horsham covered by the Upper Mole catchment (Submission Document Reference: ES/EP/02a-o);
- the Northern West Sussex Economic Growth Assessment (Submission Document Reference: EGSM/EG/07);
- Water Neutrality Study Part C – Strategy (Submission Document Reference: ES/SDC/05);
- JBA Consulting Water Neutrality Study Part B - In Combination Assessment (Submission Document Reference: ES/SDC/06);
- Gatwick Sub-Region Water Cycle Study August 2020 (Submission Document Reference: ES/SDC/09);
- the Crawley Compact Residential Study (Submission Document Reference: WC/CLD/01);
- Eco-Serv Report: Joint Horsham District and Crawley Borough (Submission Document Reference ES/GI/03).

2.5.4 This evidence has ensured that the most sustainable approach to the Spatial Strategy (Scenario 2: A sub regional focus and Scenario 3: A Crawley Borough focus) can be taken, with the Local Plan taking account of the potential impacts from strategic development as far as is possible (for example, through the introduction of Policy ST4: Area of Search for a Crawley Western Multi-Modal Transport Link). Through this pro-active approach, CBC believes the Crawley Borough Local Plan will remain sufficiently flexible and robust in the event strategic growth around Crawley was considered to be a sound spatial strategy for the borough's neighbouring authorities.

- 2.6 Question 2.6: Is the proposed content in the Plan at paragraph 12.23 on the circumstances where development proposals adjacent to Crawley will be supported justified? Will it be effective in influencing spatial strategies or adjoining development proposals at either the plan preparation or decision-making stages in neighbouring authorities?
- 2.6.1 Crawley Borough Council (CBC) believes that paragraph 12.23 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) is the most appropriate approach available for the council to formally set out its position in relation to strategic development adjacent to the borough's administrative boundaries. It is recognised that the formal decisions in relation to such proposal will lie with the local planning authority in which the site is located. However, many of the impacts and implications will fall on Crawley.
- 2.6.2 The Crawley 2035: draft Local Plan, pages 159-162 (Submission Document Reference: CBLP/05) introduced a housing typology policy to establish the policy basis upon which CBC would respond to proposals for urban extensions, Policy H3g: Urban Extensions. However, it is acknowledged that the Local Plan is unable to plan for land outside the borough's administrative boundaries so the policy has been taken out. Instead, paragraphs 12.17-12.23 of the Crawley Borough Submission Local Plan (Submission Document Reference: CBLP/01) maintain the principles which are considered of strategic cross-boundary importance to the borough.
- 2.6.3 The paragraphs in the Local Plan setting out the council's position in relation to strategic developments on its boundaries offer neighbouring authorities and site promoters a consistent message in relation to strategic and cross-boundary matters, based on evidence gathered through the Local Plan Review. They have been reflected in responses to the early engagement stages of the respective neighbouring authority Local Plan consultations, (2020 and 2022 respectively), pre-application discussions and the extensive Duty to Cooperate policy conversations, including the signed Statements of Common Ground. These paragraphs also provide Crawley residents in the neighbourhoods adjacent to these strategic developments information on the approach CBC will take in responding to consultation on these proposals.
- 2.6.4 The Northern West Sussex Housing Needs Statement of Common Ground, page 13 (Submission Document Reference: SoCG/02) confirms the authorities will continue to work together to understand the growth potential, constraints and cross-boundary impacts that could arise from large sites close to respective administrative boundaries.
- 2.6.5 The Statement of Common Ground between Crawley Borough Council and Horsham District Council, sections 6, 7, 9, and 11 pages 9-14 (Submission Document Reference: SoCG/07) reflect the position agreed between the councils in relation to strategic development to the west of Crawley. Similarly, the Statement of Common Ground between Crawley Borough Council and Mid Sussex District Council, agreements 25-28, page 6 (Submission Document Reference: SoCG/08) establish the position in relation to strategic sites adjacent to the administrative boundaries between the two authorities.

- 2.6.6 The Crawley Borough Submission Local Plan paragraphs highlight particular policies, issues and cross-boundary impacts of importance to Crawley as a planned new town which may not be considered in other districts. For example:
- The context of the new town in the countryside;
 - The neighbourhood principle approach;
 - The need for higher densities to achieve much higher levels of modal shift/change, to ensure viable public transport levels – only suitable because of Crawley’s existing network and service (not as possible in neighbouring areas due to their more rural or suburban low density layouts);
 - Similarly the greater opportunities and potential for District Heat Networks and energy efficiency.
- 2.6.7 It also confirms the importance of such development not resulting in severe cumulative impacts for existing residents in Crawley. In particular, this is based on the Local Plan evidence base which confirms the limited opportunities for such impacts to be mitigated or off-set within the borough’s own administrative boundaries (see paragraph 2.5.4 above in response to Question 2.5). This includes the importance of the delivery of a comprehensive Western Multi-Modal Transport Link connecting from the A264 to the A23 north of County Oak.
- 2.6.8 Whilst the plan-making and decision-taking responsibility for such strategic development lies with the relevant LPA within which the proposals are located, the positive historic and on-going discussions across the authorities which make up the Northern West Sussex Housing Market Area provide CBC with some confidence that the consistent and evidenced messaging set out in paragraphs 12.17-12.23 of the Crawley Borough Submission Local Plan is of support and benefit to the decision-making authority.
- 2.7 [Question 2.7: Is paragraph 12.23 justified at point \(ii\) in seeking/requiring the completion of a Western Link prior to the \(first\) completion of dwellings? Is that supported by the available evidence base?](#)
- 2.7.1 Crawley Borough Council (CBC) believes that delivery of the Western Link prior to the completion of dwellings is necessary in order to ensure there is no risk of development on the borough’s administrative boundaries impacting negatively on Crawley’s existing transport network. It also ensures that residents can take advantage of the new route and its public transport and active travel options from the outset, without establishing travel behaviours which have to be changed later. However, criterion ii allows for a different delivery trigger to be agreed between Horsham District Council, CBC and West Sussex County Council, this could, for example, be linked to the occupation of dwellings rather than completions.
- 2.7.2 The Transport Modelling (Submission Document Reference: ES/ST/01) undertaken for the Crawley Borough Local Plan has identified a number of junctions within the borough which are already at capacity or require mitigation following new development. This is based on the growth proposals of the Crawley Borough Local Plan and the existing Local Plans for neighbouring authorities (the adopted Horsham District Planning Framework, Mid Sussex District Plan and the Reigate and Banstead Core Strategy and Development Management Plan). Further cumulative impacts

from additional development close to Crawley will exacerbate existing capacity issues on roads within Crawley.

- 2.7.3 Scenario 3 in the Crawley Transport Modelling (Submission Document Reference: ES/ST/01) sought to consider further growth at Crawley, up to meeting the full Standard Method housing need from within the borough (at the time: 751 dwellings per annum) – for the purposes of the study the additional growth was located West of Ifield (3,750 dwellings) and West of Kilnwood Vale (1,546 dwellings).
- 2.7.4 The Transport Modelling Study also provided a sensitivity testing in the case of a Crawley Western Link Road (Chapter 9, pages 113-116).
- 2.7.5 CBC's concern is based on the historic experience from Kilnwood Vale, in which the transport modelling concluded that whilst the Crawley Western Link Road was not required for the development at West of Bewbush (now Kilnwood Vale neighbourhood), land should be safeguarded for the route should there be further development to the west of Crawley. The West of Bewbush Joint Area Action Plan, 2009 (Post-Submission Document Reference: PS/DS/JAAP/01) safeguarded land through the site for a Western Relief Road (Policy WB 23, pages 51-52). This land was subsequently granted permission (Horsham District Council Planning Application reference: DC/17/2481) for residential development contrary to CBC objections to the loss of the reserve land (Horsham District Council Planning Committee Report: PS/DS/JAAP/02 and Crawley Borough Council Decision Letter to Horsham District Council Consultation: PS/DS/JAAP/03).
- 2.7.6 However, as the development to the west of Crawley is coming forward incrementally, each stage seeks to suggest it is not severely impacting the existing baseline, despite the baseline being already over capacity. Without a coordinated and strong commitment to the delivery of the comprehensive transport link, strategic development adjacent to Crawley will continue to connect directly into the already congested, existing road network through Crawley. This will bring additional traffic into the town, whereas the Western Link would direct longer distance vehicular movements and Fastway bus opportunities to the Main Employment Locations of Manor Royal and Gatwick Airport, as well as joining the strategic road network further north. Sustainable transport would be improved by direct public and active travel options from the new neighbourhood into the town.
- 2.7.7 Therefore, CBC has undertaken an initial study into the section of the Multi-Modal Transport Corridor which would run through Crawley borough – the Crawley Western Link Northern Area Search Study, 2023 (ES/ST/02). This supports the Crawley Borough Submission Local Plan Policy ST4 and Local Plan Map identification of an Area of Search through which deliverable routes could be found, taking into account the Local Plan policies, in particular the safeguarded area policies for the airport. It confirms that indicative route options will be achievable, subject to further detailed, technical feasibility work and consultations by the appropriate body responsible for delivery of the route.

- 2.8 Question 2.8: Does criterion xi) at paragraph 12.23 need to be amended to ensure consistency with national planning policy at NPPF paragraph 180c) which caveats the loss or deterioration of irreplaceable habitats with “unless there are wholly exceptional reasons, and a suitable compensation strategy exists”?
- 2.8.1 Crawley Borough Council (CBC) believes that the caveats in relation to paragraph 180c) are set out in footnote 63 of the National Planning Policy Framework (NPPF) (Post-Submission Document Reference: PS/DS/NPPF/01) as being: “for example, infrastructure projects (including nationally significant infrastructure projects, orders under the Transport and Works Act and hybrid bills), where the public benefit would clearly outweigh the loss or deterioration of habitat”. In such instances, the material considerations of the NPPF footnote would override the Local Plan policy.
- 2.8.2 It is considered that these caveats would not apply to strategic housing development at Crawley for which paragraph 12.23 would be triggered. Spatial options exist within the neighbouring districts, and within the strategic sites, to ensure development would not need to result in the loss or deterioration of irreplaceable habitats. Criterion 12.23 xi) is considered to be in full conformity with the NPPF.
- 2.8.3 On this basis, it is not agreed that the amendment is appropriate nor necessary.

Issue 3: Whether Policies SD1 and SD2 in terms of over-arching policies for sustainable development are sound.

- 2.9 Question 2.9: Are the strategic objectives in Strategic Policy SD1 reflective of the spatial issues and priorities identified during the preparation of the plan including the sustainability appraisal baseline and the sustainability objectives set out at Appendix A of the Plan?
- 2.9.1 Policy SD1 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) sets the overarching approach for meeting the presumption in favour of sustainable development through the local planning policies within Crawley.
- 2.9.2 The Policy reflects the spatial issues and priorities identified during the preparation of the Local Plan. Appendix E of the Sustainability Appraisal/Strategic Environmental Assessment Report (SA/SEA), May 2023 (Submission Document Reference: KD/SA/01) details the baseline information, trends, plans, policies and programmes for a series of topic areas:
- Topic Area A: Climate Change, Sustainability, Sustainable Design and Construction
 - Topic Area B: Heritage, Character, Design and Architecture
 - Topic Area C: Housing
 - Topic Area D: Economy
 - Topic Area E: Natural Environment
 - Topic Area F: Transport and Infrastructure
 - Topic Area G: Population, Community Facilities and Open Space, Crime and Health of the Community.

- 2.9.3 The Sustainability Issues identified from undertaking the SA baseline appraisal are summarised against each of the Sustainability Objectives in Table 4.2, pages 28-32, of the SA/SEA. The Sustainability Objectives are then set out in Appendix A of the Crawley Borough Local Plan. The Local Plan Policies Sustainability Appraisal Overview table (Table 7.1, pages 46-47, of the SA/SEA, and Appendix A, page 247-248 of the Local Plan) shows the outcome of the assessment of the chosen option for Policy SD1 against the SA Objectives. This clearly shows significant positive impact on seven of the nine SA objectives (SA Objectives 1, 2, 3, 6, 7, 8 and 9) and a positive impact on the remaining two (SA Objectives 4 and 5).
- 2.9.4 The following highlights how each of the strategic objectives set out in Policy SD1 respond to the Sustainability Objectives identified in the SA/SEA:
1. Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change: SA Objectives 1 (minimise climate change) and 2 (adapt to climate change);
 2. Complements Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle and maximises the use of sustainable travel: SA Objectives 1 (minimise climate change), 3 (protect/enhance built environment), 7 (promote sustainable journeys), 8 (provide sufficient infrastructure) and 9 (promote sustainable communities and encourage active lifestyles);
 3. Conserves and enhances the heritage of the borough: SA Objective 3 (protect/enhance built environment);
 4. Protects, enhances and creates opportunities for Crawley's unique Green Infrastructure and secures measurable Biodiversity Net Gain: SA Objectives 1 (minimise climate change), 2 (adapt to climate change) and 6 (conserve/enhance biodiversity and landscape);
 5. Provides a safe and secure environment for its residents and visitors: SA Objectives 1 (minimise climate change), 2 (adapt to climate change), 3 (protect/enhance built environment), 7 (promote sustainable journeys), 8 (provide sufficient infrastructure) and 9 (promote sustainable communities);
 6. Provides for decent and affordable homes and meets the social and economic needs of Crawley's current and future population: SA Objectives 4 (Decent, affordable homes), 5 (maintain/support employment); 7 (promote sustainable journeys); 8 (provide sufficient infrastructure); and 9 (promote sustainable communities and encourage active lifestyles) and
 7. Accords with the policies and objectives set out in this Plan unless material considerations indicate otherwise.
- 2.9.5 In addition, the Local Plan Review was undertaken in the context of the Crawley Borough Council Corporate Priorities, 2023-2027 (Post-Submission Document Reference: PS/DS/CBCCP/01). Paragraphs 2.45-2.47 show how the Crawley Borough Local Plan is consistent with the Corporate Priorities. Paragraph 2.46 of the Local Plan confirms that the overarching Chapter 8 'Sustainable Development' addresses

these priorities in its strategic policies (Policy SD1: Presumption in Favour of Sustainable Development and Policy SD2: Enabling Healthy Lifestyles and Wellbeing).

- 2.10 Question 2.10: Is Strategic Policy SD2 justified by evidence that health and wellbeing is a particular issue for the Borough? How is the effectiveness of the policy intended to be measured and what is Policy SD2 expected to achieve / contribute towards over the plan period?
- 2.10.1 Crawley Borough Council (CBC) has worked closely with the health authorities – including the NHS and West Sussex County Council in developing the Local Plan. Paragraph 3.7 of the Crawley Borough Submission Local Plan, May 2023 (Submission Document Reference: CBLP/01) highlights the impact that the living environment can have on health inequalities experienced by people and the importance of ensuring the planning system supports healthy lifestyles.
- 2.10.2 The Sustainability Appraisal/Strategic Environmental Assessment (SA/SEA), Appendix E, Topic Area G, pages 179-187 (Submission Document Reference: KD/SA/01) provides detailed analysis in relation to the baseline data and information, trends, plans, policies and programmes for population, community facilities, crime and health of the community. This section also establishes what the likely evolution would be without the progression of the Local Plan and what the Local Plan can and can't influence. Table 4.2, pages 31-32, highlights the key issues affecting Crawley in relation to health.
- 2.10.3 The council's own corporate priorities (set out in paragraph 2.45 of the Crawley Borough Submission Local Plan) include "supporting health and wellbeing services". This includes working with partners, residents and other key stakeholders to enhance residents' health and wellbeing and reduce health inequalities across the town. It also seeks to encourage services back to Crawley Hospital and address GP shortages in provision across the borough (Crawley Borough Council Corporate Priorities 2023 to 2027, Post-Submission Document Reference: PS/DS/CBCCP/01).
- 2.10.4 Crawley Borough Submission Local Plan paragraphs 3.16-3.17, pages 36-37, summarise the evidence relating to health issues within the borough. This has been provided by the West Sussex Joint Strategic Needs Assessment (JSNA) "People and Places" for Crawley, 2019 (Submission Document Reference: DS/WS/03) and highlights specific health challenges in Crawley. This includes the impact on health of people living in more deprived areas with big differences in life expectancy matching deprivation – South West Crawley experiences some of the greatest levels of deprivation in Sussex, as evidenced in the Sussex Health and Care Assembly and the Sussex Integrated Care Board, as set out in their "Improving Lives Together" strategy document, December 2022 (Post-Submission Document Reference: PS/DS/NHS/01).
- 2.10.5 Policy SD2 is an overarching strategic policy, highlighting the importance of planning for healthy lifestyles and wellbeing and signposting other policies in the Plan which support this objective, whilst also meeting other requirements of the Plan. Policy SD2 does, however, also require major developments to submit Health Impact Assessments to demonstrate how they meet the requirements of Policy SD2 and therefore how major developments in the borough will contribute to health and wellbeing of its residents and employees. In its response to the Initial Publication Consultation (Submission Document Reference: KD/CS/01e page 13) West Sussex

County Council's Public Health Team recognised the joint work of the two councils in developing Policy SD2 and formally supported the Policy and the requirement for Health Impact Assessments. They confirmed that this is in line with West Sussex County Council's Public Health's position to *recommend that a health impact assessment (HIA) is undertaken for all major plans, policies and development proposals across West Sussex.*

- 2.10.6 West Sussex will continue to monitor health indicators, including for Crawley, on an ongoing basis, and this information will feed into Local Plan monitoring.
- 2.10.7 The Sustainability Appraisal/Strategic Environmental Assessment, page 34 (SA/SEA) includes indicators in relation to health. These will be monitored and reported in CBC's Authority's Monitoring Report, at least annually.
- 2.10.8 The requirement for Health Impact Assessments for major developments will be monitored through the Annual Monitoring Report.