

Appendix 3

Verbatim Representations

Category 1: General Feedback

Name	Organisation	On Behalf of:	General Feedback Comments
Tricia Butcher	The British Horse Society		<p>The overall commitment shown in this document towards protecting and enhancing the green infrastructure, public rights of way and recreational routes in the Borough is to be welcomed. This is in line with the new National Planning Policy Framework, para 75, which states "Planning policies should protect and enhance public rights of way and access. Local authorities should seek opportunities to provide better facilities for users, for example by adding links to existing rights of way networks."</p> <p>By acknowledging the importance of these assets to the communities quality of life, the economy, and to wildlife, it is to be hoped that the potential threat from increasing levels of development will be mitigated.</p>
Katherine Harrison	Surrey County Council		<p>Cross Boundary Working</p> <p>We would like to see a clearer policy commitment in the Local Plan Preferred Strategy to cross boundary working. The consultation draft Local Plan Preferred Strategy includes reference to the need for cross boundary working and mentions the cross boundary impacts of development. However, there is no specific policy hook for cross boundary mitigation to be funded by the developer. Evidence should be provided in the Local Plan to establish whether Crawley Borough Council has considered the possible cross boundary impacts of the development proposed in the Local Plan on Surrey as a neighbouring authority. If significant impacts are likely to arise, then they will need to be mitigated. In transport infrastructure terms, this is specifically required to ensure the continued safe and efficient operation of the strategic and local road networks.</p>
Gary Marsh	Mid Sussex District Council		<p>Mid Sussex District Council welcomes the opportunity to comment on Crawley Borough Council Local Plan Preferred Strategy.</p> <p>Having considered the Preferred Strategy, Mid Sussex District Council looks forward to continuing to work with jointly with Crawley Borough Council on cross boundary issues before the next version of the Local Plan is finalised.</p> <p>I would be grateful if you could contact my Head of Planning and Economic Development, Claire Tester, in due course to arrange a further meeting to discuss such matters.</p>
Collin Lloyd			<p>Thank you. I trust the document contains policies which are sufficiently robust to protect small areas of green space in residential areas from development. As an example of what I mean I cite the most unfortunate decision of the council's cabinet to make available for consideration for development the green at Ely Close in Tilgate and to explore the feasibility of development on other similar greens, such as at Chichester Close. Typically these are obscure and micro locally highly valued places which have lain undeveloped since the advent of the New Town in the early 1950s and which play their part in contributing to the green character of Crawley. I hope the councillors who have been working on the new document have been alive to the possibility that the green character of Crawley could be vulnerable to progressive erosion unless the planning policies are in place to enable confident resistance by this and future generation of planners and councillors.</p>

David Hutchinson Pegasusf1681.nson

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	General Feedback Comments
			Both of these issues need to be resolved before the Council can proceed to a Submission Draft Local Plan.
Peter Jordan			<p>I found the Plan exceptionally difficult to read for a number of reasons:</p> <ol style="list-style-type: none"> 1. The use of many words where fewer would have been better. 2. The use of jargon where plain English would have been clearer. 3. The lack of an overall means of navigation.

Name	Organisation	On Behalf of:
------	--------------	---------------

Name	Organisation	
------	--------------	--

Name	Organisation	On Behalf of:	General Feedback Comments
			<p>outdoor seating recently installed in the town centre and the neighbourhoods. The existing wooden benches needed re-varnishing, but they were low key and reasonably comfortable. The new seats are too cold for comfort and the supporting columns are so high that nobody's feet touch the ground when they sit on them. Like almost every item in the Marshall's catalogue they are vulgar and brash, like the Fastway bus shelters. To add insult to injury, when the new benches were installed, the workmen couldn't be bothered to remove the brown tape holding the protective covering used when they were transported. Why does CBC choose hideous street furniture, and have it installed by subs?</p> <p>Similarly, when the Furnace Parade and Tilgate shopping parades were refurbished the ridiculous amounts of money wasted, and the disruption caused by the casual approach to work by the contractors, was closely observed by shopkeepers and shoppers. This neglect on the part of the council to spend public money wisely, and to monitor work it has commissioned, has done a great deal of damage to its reputation. In the case of Furnace Parade, where I do my shopping the builders damaged the roofs of the Foxglove or Jacaranda tree by the post box, and killed it off. And then there was the remedial work relaying the paving because the electricity supply to the lighting had been forgotten. I will not spend time writing all the problems, but it was a poorly managed project.</p> <p>I don't know how Crawley BC places its contracts, but its record is far from impressive. Perhaps the staff in the council responsible for contracts do not realise that very few companies do good work, and perhaps they do not realise that sometimes midnight has to be burned. It certainly isn't easy to make good design and planning decisions, but if the plans once arrived at are not faithfully carried out, it ends in tears.</p> <p>Even more worryingly, it is my impression that planners, architects, and designers, working now, have no philosophy and no vision. I have been in the last few weeks to Birmingham and Sheffield, two wonderful cities ruined by traffic engineers determined to give motorists priority over pedestrians, but equally unfortunately the replacement buildings are all disgraceful examples of the work of developers' architecture. Are these professions stating on the shoulders of giants? Colin Bencham the "Traffic in Towns" guru, maybe, but certainly not Lewis Mumford the planner, or Walter Segal the housing architect. The body of knowledge stretching back to the Greeks and Romans seems to have been ignored or lost. Allowing the tail (in your case Marshall's) to wag the dog is ruining this town and, if you are not careful, the last chance of turning the tide with the new Local Plan will be missed. It is ironic that the first stage in the Town Centre North work is to demolish arguably the most outstanding piece of architecture in the High Street, the Embassy Cinema.</p> <p>As you said when we met, I am trying to educate you. But are you taking what I say on board, and if so will CBC take what you say on board?</p> <p>Judging by appearances, the present regime is like the country's major parties, believing that bigger is better, private is always better than</p>

Name	Organisation	On Behalf of:	General Feedback Comments
			visited two excellent modern factories last week.
Neil McDonald			OBJECTION - Third, and in the light of the above, I object to being advised that consultation on the document closes at 5.00pm Monday 3 December

Name	Organisation	On Behalf of:	Policy:
------	--------------	---------------	---------

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
				North Sussex Housing Market area, and would like to reiterate our willingness to be part of that work insofar as it relates to localised cross boundary movements between Crawley and Reigate & Banstead (Horley). We would suggest that this work should be completed before the Crawley 2029 Plan is finalised for submission.
Jack Straw	Mole Valley District Council		STRAT3	<p>8. We acknowledge policy STRAT3: Meeting Housing needs across the Housing Market Area, but although the preceding text talks about cross-boundary working to understand the nature of the wider housing market area, this is not reflected in the policy which appears to relate only to development within the Borough's boundaries.</p> <p>9. It is recognised that Crawley is in a constrained position and the need to prevent town cramming and the loss of open space within the Borough is supported. However, Mole Valley is also in a highly constrained position with significant areas of AONB, Green Belt, Special Areas of Conservation and limited land supply. The concern is that if the needs of Crawley are not being met within or near to the town, this will have a knock-on effect particularly to Boroughs such as Reigate & Banstead with which Mole Valley has far greater levels of movement both in terms of flows of household and travel to work patterns.</p>
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	STRAT3	SUPPORT - It is noted that the Borough Council will positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible. In this respect the site at Saxon Road remains available and should be considered as a housing site. This is likely to require an amendment to the Built Up Area Boundary and/or an amendment to Policy CH12.
Jane Noble	West Sussex Local Access Forum		STRAT4	Members support the continued use of the neighbourhood principle of development, where local facilities are easily accessed along informal green spaces. The Plan recognises that with this type of development local trips are most accessible by foot, cycle or public transport.
Tim Hoskinson	Savills	Wilky Group	Spatial Development Strategy	...a new strategic employment site is needed in order to realise the potential of the Gatwick Diamond area to deliver a business location and opportunity of international standing that would attract major inward investment and meet the wider objectives of up-skilling the workforce and re-positioning the sub-regional economy.
Tim Hoskinson	Savills	Wilky Group	Spatial Development Strategy	...Whilst we recognise the important role of these existing employment areas, reliance on these alone will not deliver the wider sub-regional aspirations for economic growth. There is a clear need for a strategic employment allocation in recognition of Crawley-Gatwick's strategic economic hub

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
------	--------------	---------------	---------	-------------------------------

role.

To achieve additionality and up-skilling and to ensure that Crawley-Gatwick remain competitive into the future will

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
				<p>opportunity for a new strategic business location to attract business which cannot reasonably be accommodated within existing business areas. The need for the local authorities within the Gatwick Diamond to work together and to take a flexible and responsive approach to such opportunities is highlighted.</p> <p>Improving skills levels is also identified as a major issue for Crawley and the Gatwick Diamond. The plan notes the ambition to secure a university centre to act as a catalyst for change, raise aspirations and enable people to develop the skills needed in a changing economy. Education and training provision forms an important part of the proposals for Gatwick Green and its proposed land use mix makes provision for a multi-university campus to be accommodated, fostering links between business and education. To this end, the Wilky Group has entered into a protocol with Central Sussex College and the University of Brighton.</p>
Tim Hoskinson	Savills	Wilky Group	Policy Context	<p>CORPORATE PLAN -</p> <p>35. The priorities set out in Crawley's Corporate Plan include encouraging sustainable local economic growth and seeking out opportunities for drawing new elements into the local economy to broaden the contribution to and potential for Crawley's economic prosperity. The Corporate Plan states that these actions will be supported by efforts to raise the aspirations and skills of local people and nurture an enterprise culture.</p> <p>36. The evidence base submitted in support of the Gatwick Green proposals highlights the potential for Gatwick Green to shift Crawley's employment mix towards higher value added activities with new and additional employment activities in higher skilled jobs. Gatwick Green provides the opportunity for a significant scale of innovation focused development that would not otherwise be attracted to the area.</p>
Tim Hoskinson	Savills	Wilky Group	Local Plan Objectives	<p>LP OBJECTIVES - The proposals for Gatwick Green align well with the Local Plan objectives. In particular, Gatwick Green would make a significant contribution to meeting Objective 8: To improve the business offer and to maintain, support and promote a diverse employment base that can serve the local and sub-regional and regional economy.</p>
Tim Hoskinson	Savills	Wilky Group	STRAT1	<p>The overarching principles of meeting the presumption of sustainable development as set out in Policy STRAT1: Presumption in Favour of Sustainable Development are supported. The proposals for Gatwick Green have been formulated to respond to the economic, social and environmental dimensions of sustainable development, as set out in the supporting evidence base and summarised below in our comments in relation to Policy STRAT2 and Policy EC1.</p>

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
Tim Hoskinson	Savills	Wilky Group	STRAT2	...SEE FULL REP - The draft Local Plan does not address

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
------	--------------	---------------	---------	-------------------------------

Tim
Hoskinson

Name	Organisation	On Behalf of:	Policy:	Development Strategy Comments
------	--------------	---------------	---------	-------------------------------

Category 3: Character

Name	Organisation	On Behalf of:	Policy:	Character Comments
Tricia Butcher	The British Horse Society		CH3	Normal Requirements of All New Development a) This paragraph is strongly supported, as provides protection for public rights of way, green corridors and green infrastructure.
Chris Owen	West Sussex County Council		CH3	A requirement to maximise the use of recycled and secondary aggregates during development (sustainable construction design) should be included. This would be in line with Policy W23 of the West Sussex Waste Local Plan Proposed Submission Draft (Regulation 19), November 2012.
Chris Owen	West Sussex County Council		Local Heritage Assets:	The following introductory paragraph to this section is suggested: Although Crawley today is characterised by its New Town status, and proximity to Gatwick Airport, it has the distinction of being one of around 40 historic Sussex towns included in the joint English Heritage, West and East Sussex County Councils Extensive Urban Survey project (EUS). Following sustained redevelopment in Crawley centre, and close to the historic High Street, in the last two decades the results of development-led archaeological excavation have provided a significant insight into the town's early industrial and domestic past. The West Sussex Historic Environment Record (HER) should be referenced - please refer to paragraph 128 of the NPPF. Paragraph 169 similarly underlines the importance of the HER.
Chris Owen	West Sussex County Council		CH10 Part B:	English Heritage has prepared a guidance note on the soundness of local plans in respect of historic environment matters see "Heritage in local plans: how to create a sound plan under the NPPF", 25 July 2012, which is available on the English Heritage HELM website.
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	CH4	OBJECTION - The entire area of Worth Conservation Area cannot be designated as 'structural landscape' as the area contains development and not all of the area fulfils the functions of structural landscaping. The policy as written appears to be internally inconsistent by accepting development in principle but then seeking to protect and enhance the designated areas. The ambiguity would be removed by seeking development schemes which protect and enhance the character of these areas.
Tony Fullwood	Tony Fullwood Associates	Mr M Robinson	CH8	OBJECTION - The Policy is not positively framed in line with the presumption in favour of sustainable development and is therefore not consistent with national planning policy. The NPPF now expects proposals to respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation. The term 'respects' is

Name	Organisation	On Behalf of:	
------	--------------	---------------	--

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Character Comments
Tony Fullwood	Tony Fullwood Associates	Mrs J Williams	CH8	OBJECTION - The Policy is not positively framed in line with the presumption in favour of sustainable development and is therefore not consistent with national planning policy. The NPPF now expects proposals to respond to local

Name	Organisation	On Behalf of:	Policy:	Character Comments
				in isolated new homes in the countryside it would not be considered appropriate.
Brenda Burgess				Conservation. Attempt to keep Three Bridges Station - or at least the front facade - as this is an historical to Three Bridges as it represents the original 19th Century New town of the railway era. Also conserve Montefiore hall and Sensitive building with in the neighbourhoods
Brenda Burgess				keep and conserve the Town hall as an historic building of Crawley and a representation of 60's architecture. Same for College tower. (This does not mean that we should not renovate the offices at some point)
Jenny Frost	Ifield Village Conservation Area Advisory Committee			<p>General</p> <p>IVCAAC: pleased to see that:</p> <ul style="list-style-type: none"> • Ifield Station improvements are to be considered • Ifield Meadows (south and those in the conservation area) are given high profile • The Village Green is mentioned • No building outside the built up area boundary is to be permitted. <p>Locally listed buildings</p> <p>There is no mention of the locally listed buildings in the area (as opposed to the nationally listed buildings, which are mentioned). Was there a reason for this?</p> <p>Extension of the conservation area</p> <p>IVCAAC supports the extension of the conservation area and sent a separate, detailed document about this on 29 November 2012.</p> <p>Area of Special Character</p> <p>IVCAAC supports the designation of the 'Arts and Crafts' houses in Rusper Road as creating an Area of Special Character. We think that Horsham should be alerted to this as some of the buildings continue into the Horsham section of Rusper Rd. (although there is one where the features have been covered with white plaster and blue shutters).</p> <p>Loss of protection?</p> <p>IVCAAC is sorry that the four large houses and gardens in Rusper Road north east of the Arts and Crafts style houses, which were previously in the area of Special Environmental Quality (a designation that is to be removed) may not be well protected. Do other policies give these houses protection from being knocked down and replaced by higher density housing that would be out of place in the road?</p>
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH6	SEE FULL REP -

Name	Organisation	On Behalf of:	Policy:	Character Comments
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH3	<p>SEE FULL REP -</p> <p>In addition to the identified standards referred to above (comment no 123), it is noted that Policy CH3 seeks to impose a general policy requirement for development to "adhere" to supplementary planning guidance that the Council may produce in the future. PH & TW would object to this.</p> <p>This would enable the Council to create standards and impose additional burdens outside of the normal scrutiny of the development plan process and then impose them as though they were policy through CH3. This is contrary to national guidance contained in the NPPF at paragraph 153 which states:-</p> <p>"Each local planning authority should produce a Local Plan for its area. This can be reviewed in whole or in part to respond flexibly to changing circumstances. Any additional development plan documents should only be used where clearly justified. Supplementary planning documents should be used where they can help applicants make successful applications or aid infrastructure delivery, and should not be used to add unnecessarily to the financial burdens on development."</p>
Elizabeth Burt	Savills	Crest Strategic Projects		<p>Characters map, page 37 – This map identifies that the Kilnwood Vale site is covered by a landscape character edge designation. There does not however appear to be any identification or definition of what this is. The site is an allocated site for a new neighbourhood and has consent for approximately 2,500 dwellings. It is therefore unclear why this designation has been placed on the site and CSP requests its removal.</p>
Alyson Jones	Barton Willmore	SEGRO	CH11	<p>It is not clear as to the basis for the designations that have been identified on the Proposals Map, which only refers to 'studies', from which it is not possible to discern which studies relate to these particular policies. A clear justification for each of the designated views should be provided to understand the particular characteristics that the Council is looking to preserve.</p> <p>The Policy wording indicates that verified view montages and cross sections will be required in order for the visual impact of proposals affecting these important views to be demonstrated. It should be clarified that proposals, which do not cross or directly obstruct the view, will not require such onerous requirements to be fulfilled. For example, it would be inappropriate for development within the designated Manor Royal Business Estate that fronts onto one of the corridors, but does not sit within the corridor, to have to provide such evidence, given that the view follows the road corridor and not the land adjacent. Such requirements could unnecessarily stifle economic regeneration in the area.</p>

Name	Organisation	On Behalf of:	Policy:	Character Comments
John Lister	Natural England			<ul style="list-style-type: none"> • Future development of the town should protect and enhance the role of neighbourhoods and their centres. <p>Natural England agree the role of neighbourhood centres should be enhanced as this promotes local accessibility to services and amenities throughout the Borough.</p>
John Lister	Natural England			<ul style="list-style-type: none"> • The future design of buildings should reflect the existing character of the town. New development should not look out of place in the new town setting. <p>Natural England agree that the design of building should reflect local character, but emphasise that the natural environment also has a role to play in delivering local distinctiveness and a sense of place.</p>
John Lister	Natural England			<ul style="list-style-type: none"> • Several areas have been identified in the Local Plan for their “special architectural interest or character.” It is important to protect these areas by designating them as Conservation Areas. <p>It is not within the remit of Natural England to comment on architectural importance.</p>

John Lister Natural England

- Within the town, there are specific views and landscapes which the council believes should be protected for future generations. These are thought to add character to the town and any new development should not obstruct them.

Natural England would wish to see further details and evidence of consideration of all landscapes in accordance

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Character Comments
John Lister	Natural England		CH1	Natural England welcome the aim within policy CH1 to maintain a clear pattern of land uses and whilst urban design issues lie outside the remit of Natural England, the encouragement to create public spaces and attractive routes to ensure places are connected for all members of society are aspects that are supported and encouraged by Natural England since this contributes towards a more sustainable development; by increasing choice in movement and reducing the reliance on the private motor car.
John Lister	Natural England		CH3	Natural England support the emphasis within policy CH3 to ensure important features such as views, landmarks, rights of way, trees, open spaces and footpaths are integrated, protected and enhanced within any new developments. Natural England consider each factor helps to deliver a more sustainable development, by providing a choice of access thus reducing the reliance on the private car, and by providing for biodiversity by integrating existing green attributes within development proposals.
John Lister	Natural England		CH12	Natural England support the protection of the countryside

Category 4: Economic Growth

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	EC1	Similarly Policy EC1 which encourages economic growth is also supported.
	Crawley Young Persons Council			<p>Better town centre?</p> <ul style="list-style-type: none"> · Some members felt there was not enough security in the town centre during the night · More restaurants in Queens square was suggested and supported by many members · Drop in youth centre was suggested · More colour around town? · A possible mall card offered to customers to gain discounts after spending a certain amount of money in stores within County Mall?
	Crawley Young Persons Council			<p>Do you see yourself living in Crawley in the next 10 years?</p> <ul style="list-style-type: none"> · Many members felt they wouldn't want to live in Crawley after finding a job. <p>Argued that there are better job opportunities in big cities such a London.</p>

Andy
Evans

Miller Homes

The plan provides no guidance as to the level of new sites for economic development which need to be identified or indeed the criteria by which any such proposed sites might be judged (other than reference to NPPF). The issue is simply stated that there is no suitable land not protected for other uses. We consider the plan to be wholly inadequate in this regard. Without an understanding of the economic pressures for further expansion and balancing this against other constraints, the plan cannot be said to have been positively prepared and would be unsound. We note the employment land studies undertaken to inform the plan which recommend further site allocation on both quantitative and qualitative basis but those conclusions do not seem to have fed into a positively prepared policy framework for the new plan.

We would also note that should land east of Brighton Road

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				<p>not seem to have fed into a positively prepared policy framework for the new plan.</p> <p>We would also note that should land east of Brighton Road be eventually found unsuitable for residential development, land within that broader area at Old Stone Cottage is eminently suitable for an extension to the adjoining Business Park providing a highly accessible addition to the potential stock of employment premises.</p>
Martyn Chase	Stanhope plc			<p>The Local Plan will play a vital role in setting the appropriate planning context for major regeneration projects that are essential for the realisation of this vision. Stanhope, as the Council's development partner at Town Centre North, supports the identification of Town Centre North as an area of opportunity with the potential to deliver the on-going vision for high quality jobs, homes and shops, and make the Town Centre an attractive place to be. In addition Stanhope endorses that the Local Plan aims to give investors in the Town Centre confidence by reinforcing the town centre first thrust of national planning policy guidance and restricting competing retail development that may be proposed outside the town centre.</p>
Martyn Chase	Stanhope plc		EC2 & EC3	<p>The Local Plan makes reference to the approach for the Town Centre being to prioritise retail over other use classes (p.58); Stanhope are supportive of this position but given the extent of the town centre boundary would like to see a continued emphasis on retail development of any scale being directed toward Town Centre North. Other use classes may take preference in the non-core areas (secondary shop frontages) within the wider town centre so as not to impact on the viability and vitality of the retail heart of the town centre. This is recognised in Policies EC2 and EC3 but could be enhanced; and could in addition recognise the changes that could take place in the various town centre locations during the life of the Local Plan following on from the delivery of Town Centre North and any consequential changes in retail capacity</p>

Martyn Chase

Stanhope plc

The recognition of primary and secondary streets is a connected issue (p.64), flexibility is sensible in the consideration of the frontages, although the Town Centre North proposals will likely enhance the Broadway as a retail destination and this should be recognised in the Local Plan.

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
Martyn Chase	Stanhope plc		EC5	We welcome Policy EC5 and its priority to Town Centre North and the wider town centre against Non Central Retail Development. It is our view that any developments of this

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
------	--------------	---------------	---------	--------------------------

of the development will not undermine the vitality and viability of the town centre or neighbourhood centres.

We therefore suggest the fourth paragraph of Policy EC3 is reworded as follows:

“A net increase in retail floorspace in edge of centre development will be permitted, provided the applicant can demonstrate through the sequential test that there are no sites in the town centre that are available, suitable and viable for the proposed development, and can demonstrate that the proposals would have no significantly adverse impact on the vitality and viability of the town centre or neighbourhood centres. Further guidance on the Council’s aspirations for each of the allocated development sites will be set out in separate development principles statements.”

Rewording the policy as such not only brings the policy in line with national policy set by the government, making it ‘sound’, but will also ensure that development opportunities close to the defined primary shopping area are not lost. Such development may not only help to enhance the town’s role as a Primary Regional Centre, but may also strengthen the viability of the Town Centre North scheme in the future. It would also allow new retail development to come forward in the town at a time when viability is maintained. (1.9 of 6.6) (the) (uld hi)-ares. Furt

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				"f) are for sui generic warehouse club provided that the sequential and impact tests of the NPPF are met."
Cath Rose	Reigate & Banstead Borough Council		EC1	We have previously commented on proposals for Town Centre North (TCN), and subsequently had positive discussions at an officer level to seek to ensure complementarity between TCN and our plans for Redhill town Centre. We support the growth of Crawley town centre, however also suggest that it would be appropriate for the Plan to clarify, in broad terms, the anticipated phasing of development at Town Centre North. This would ensure that the complementarity of proposals for both Crawley and Redhill can be more clearly demonstrated and understood.
John Adams	Drivers Jonas Deloitte	Shearer Property Group	EC5 & EC6	In brief, SPG object to Policy EC6 on grounds that Criteria C contains an arbitrary definition of the maximum amount of retail that will be permitted at Manor Royal (i.e. 300 sqm). This reference to 300 sqm is not, to the best of our knowledge, supported by robust evidence and in the context of Manor Royal – one of the largest business districts in the South East – is unreasonable, as it would serve to restrict proposals substantially larger than 300 sqm which have the potential to be genuinely ancillary to the business function of the estate. Each application for retail development in Crawley must be considered on its own merit and against the retail policies as defined by Policy EC5 of the Preferred Strategy. They should also have regard to the potential contribution of each individual proposal to the economic growth of Manor Royal and to the



Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				<p>Arbitrary planning policies designed to restrict generators of footfall such as the Bank in primary shopping frontages will actively work against the achievement of the Council's objectives and is inconsistent with national policy. The Bank's evidence of how it increases vitality and viability in primary frontages shows that there is considerable benefit in seeking to attract those A2 users such as banks who provide a high level of investment in, and maintenance of, their premises resulting in active and attractive street frontages. This will foster very significant footfall and pedestrian activity and attract investment by others, helping to provide the confidence and commercial viability necessary for any programme of regeneration or investment. To be Justified and Consistent with National Policy, Policy EC4 must be revised to remove the arbitrary restriction on the presence of financial service retailers such as the Bank in designated frontages. If this is not</p>

Name	Organisation	
------	--------------	--

Name	Organisation	On Behalf of:
------	--------------	---------------

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				definition as to its status within the Local Plan draft document.

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
				<p>should be welcomed.</p> <p>To this end, Manor Royal has several sites, including those owned by SEGRO, where there is potential to broaden land uses to include appropriate levels of retail, leisure, other employment generating uses, and other complimentary uses. This would not only respond to market interest shown, secure investment, jobs and regeneration for Manor Royal, but if carefully managed could be achieved in a way that supported rather than competed with the town centre. The alternative is to see such sites remain under utilised and vacant for an indefinite period.</p>
John Lister	Natural England			<ul style="list-style-type: none"> Manor Royal is the largest business area in the town. We should encourage the area to remain a business district? <p>It is not within Natural England's remit to comment on this</p>
John Lister	Natural England			<ul style="list-style-type: none"> There should be guidelines which aim to smarten up the look and feel of the Manor Royal area. These guidelines could relate to the main gateways and roads through Manor Royal or to the area as a whole. Do you agree? What should the guidelines apply to? <p>Main roads and gateways into Manor Royal or; Everywhere within Manor Royal</p> <p>Natural England support the statement within the Economic Growth chapter (p 56); 'central to achieving the vision for Manor Royal, is the delivery of qualitative improvements to the environment through the implementation of high design standards at key gateway sites and frontages and through the support of inward investment.</p>
John Lister	Natural England			<ul style="list-style-type: none"> The Local Plan should limit retail development outside the town centre <p>Natural England support this sentiment as locating retail development in town centre areas promotes sustainable development objectives particularly in terms of accessibility to sustainable modes of transport.</p>
John Lister	Natural England			<ul style="list-style-type: none"> The council should continue to protect neighbourhood parades for uses that serve the needs of the local community <p>Natural England support the protection of neighbourhood parades as this helps to maintain accessible local services and amenities and may reduce car based travel.</p>
John Lister	Natural England			<p>The Local Plan recognises that alongside the Manor Royal Business District there are other areas which support the economy of the town. These include Three Bridges, Maidenbower Business Park, Tilgate Forest Business Centre and Broadfield Business Park. In future these areas should be protected for employment purposes</p> <p>It is not within Natural England's remit to comment on this</p>

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Economic Growth Comments
John Lister	Natural England		EC1	Natural England welcome the comment; 'Development

Category 5: Housing

Name	Organisation	On Behalf of:	Policy:	Housing Comments
Ian Miller	Tinsley Lane Residents Association		H2	<p>Tinsley Lane is a discrete residential area bounded on two sides by the Manor Royal Business District and separated from Pound Hill and the rest of Three Bridges by the railway line and Crawley Avenue motorway link road. Within these defined boundaries, and with a mix of housing styles, many dating from before the New Town, it has developed a village like community with a strong local identity which should be protected and enhanced within the Local Development Framework. The unique semi-rural characteristics of Tinsley Lane should thus be protected by designating it to be an Area of Special Environmental Quality.</p> <p>Shielded from the railway line by Summersvere Wood (protected Ancient Woodland and home to a range of wild-life) this area could be utilised as a valuable recreational facility by the addition of nature trails etc. There are also three sports fields (two leased by Oakwood football Club) owned by the Homes and Communities Agency, which</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				With new recreational facilities centred on Oakwood football Club, Tinsley Lane could become a distinct individual area of Special Environmental Quality of which Crawley could be proud.
Jamie Lewis	Hunter Page Planning Ltd	Private Landowner	STRAT3	<p>The National Planning Policy framework (NPPF) requires local authorities to 'use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area' (NPPF paragraph 47).</p> <p>The Spatial Development Strategy set out on page 15 of the Crawley 2029 Preferred Strategy recognises this as 8,100 dwellings from 2014-2029 from Scenario A in the evidence base. This document also set out ranges from under 5,250 dwellings to 9,450 dwellings over the same period. This latter figure is likely to meet the current local projection of housing need and demand but is also likely to lead to pressure for inward migration and a mismatch between the provision of new homes and jobs. Whilst a rate of 400 dwellings per annum has been achieved over the past 20 years (equivalent to 6,000 over the plan period), the evidence base shows that 550 dwellings per annum (equivalent to 8,250 over the plan period) is likely to support most demographic needs including migration and is therefore the most sustainable. Policy STRAT3, which aims '...to positively consider proposals for the provision of housing to meet local housing needs, taking a pro-active approach to identifying suitable sites for housing development and working to overcome constraints wherever possible...' is therefore welcomed.</p>

Jamie Lewis Hunter Page Planning Ltd Private Landowner

Name	Organisation	On Behalf of:	Policy:	Housing Comments
Andy Evans	Miller Homes		H1	<p>Policy H1 proposes a net increase of 3545 dwellings 2014-2029 equivalent to 236 dwellings pa. This level of development falls well below any reasonable assessment of housing requirement by NPPF. While some employment forecasts generate a lower housing requirement, such forecasting does not remove the needs of the population for suitable accommodation. Moreover, the existing high levels of in commuting to Crawley suggest that housing provision ought if possible to try to better balance housing and employment such that low growth forecasts should not equate to low housing provision even if economic forecasting were the prime driver of housing requirement – which it is not. As a result we would expect to see a thorough examination of opportunities for accommodating levels of housing closer to indicated requirements that proposed under H1 before any conclusion could be reached that H1 provision is appropriate. We do not consider the SHLAA achieves this and refer to the land east of Brighton Road as one such opportunity where potential to deliver additional housing has not been fully explored. There is also very little information regarding how needs unmet within the Borough can be accommodated elsewhere. Without both elements of such evidence, the plan is likely to be found unsound.</p>
Martyn Chase	Stanhope plc		H2	<p>We note the inclusion of Town Centre North as a Key Housing Site (policy H2) and welcome the possibility of a phased approach to delivery reflective of the commercial requirements and retail priority for the wider site.</p>
Andy Kitchen	Pegasus Group	Persimmon Homes South East	H1	<p>With reference to Paragraph 182 of the National Planning Policy Framework (NPPF) we consider that the preferred strategy set out in the consultation document is not sufficiently 'effective'.</p> <p>Firstly, in taking a 'supply-led' approach to housing provision, the Council is not fulfilling its requirement to 'cater for housing demand and the scale of housing supply necessary to meet this demand' within the district boundary. Paragraph 47 of the NPPF advises that in order to "boost significantly the supply of housing", local planning authorities should</p> <p>"Use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this framework".</p> <p>In situations where development requirements cannot wholly be met within their own areas, the NPPF (paragraph 179) requires local authorities (in the context of the duty to cooperate set out in the Localism Act) to "work collaboratively with other bodies to ensure that strategic priorities are properly coordinated and clearly reflected in individual Local Plans". Such joint working should enable local planning authorities to work together to meet development requirements.</p> <p>The consultation document is very clear in the outlining the stark housing needs but does not currently go far enough in attempting to meet these needs.</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
------	--------------	---------------	---------	------------------

Secondly, in the face of failing to meet its housing needs the consultation document proposes at Policy CH6 to not

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				area.
Jack Straw	Mole Valley District Council		H5	11. Policy H5 indicates that a suitable policy approach will be presented for consultation once the level of need for traveller pitches has been established. It would be helpful to clarify whether this will include the identification of land for new sites/plots and if not, why this is not being addressed in the Local Plan.
Steve Tremlett	Brighton & Hove City Council		H1	<p>Brighton & Hove City Council notes that Crawley Borough Council is making provision for only 236 new homes per year over the Plan period. This is significantly less than required by the still extant South East Plan.</p> <p>The Plan identifies that Crawley is part of the Northern West Sussex Strategic Housing Market (SHMA). However there is considerable overlap between housing markets in the South East. The Northern West Sussex SHMA is adjacent to the Brighton & Hove SHMA which includes Brighton & Hove, and the significant volumes of workers travelling from Brighton and Hove to workplaces in Crawley Borough is indicative of the linkages between the areas. This is reflected in the involvement of Crawley BC in the ongoing officer meetings with BHCC and other authorities in the Brighton & Hove SHMA to address the Duty to Cooperate on this cross-boundary issue.</p> <p>Given that the authorities that comprise the Brighton & Hove SHMA as a whole are not able to provide for the objectively assessed demand, it is important that all reasonable means of maximising housing provision across the area are pursued.</p>

Brenda Burgess

Investigating the transformati

Name	Organisation	On Behalf of:	Policy:	Housing Comments
		Homes PLC and Reside Developments Ltd.		not meet that need. However, the contribution that such authorities can make and the inter-relationship between authorities has not been identified. There is clearly an absence of co-operation as requirement by section 110 of the Act and paragraphs 178 to 101 of the NPPF. The draft plan is therefore not sound. Due to the failure to co-operate alone, the plan has not been positively prepared, it is not effective, and hence is not justifies nor consistent with national policy..."
Kerry Pflieger	Development Planning & Design Services Ltd	Private Landowner		SEE FULL REP - The landowner supports the inclusion of the North East Sector, Residual Land as a Key Housing Site in the Preferred Strategy Local Plan and can confirm (as explained above) that the site is deliverable, in accordance with paragraph 47 of the NPPF. The land owner does however contest that the whole of the subject site should be identified as a key housing site in order to enable a comprehensive scheme for the site to come forward rather that a scheme that is disctated by an arbitrary line.
Kerry Pflieger	Development Planning & Design Services Ltd	Private Landowner	H2	the land owner also requests that the working of policy H2 is amended to include the word "approximately" before 100 dwellings to provide scope for a higher level of housing on the site, if considered acceptable following detailed site survey work.

David Hutchinson Pegasus Group Persimmon Homes and Taylor Wimpey

SEE FULL REP - It is a general concern of both my clients that the council has failed to identify sufficient land to meet identified housing needs. It is noted that the councils proposed supply of sites only amounts to circa 240 dwellings per annum when there is recognition that there is a need for 500+ dwellings per annum.

In order to rectify this shortfall it is considered that the additional land should be identified for housing. Whilst this will need to be the subject of a further borough wide review, PH and TW will endeavour to work with officers at the Council to identify additional housing opportunities in and around the consented NEW Sector site where they can be integrated into the master plan for the area.

Officers will be aware that additional housing land was identified in the previous Local Plan and the Core Strategy for the larger neighbourhood of 2,700 dwellings. It is recognised that there are constraints affecting the area. PH, TW and Pegasus Group are currently active in the area.

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				to dictate the mix that must be delivered on all sites.

Sally
Stallan

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				<p>the North East Sector. For this reason development related benefits should be made including any necessary improvements to the highway infrastructure within Tandridge District in the locality. These improvements would need to include mitigation measures to be carried out to minimise additional traffic in the District using the cross boundary routes in the vicinity of the North East Sector.</p> <p>It is considered that the area should be protected by including any of the undeveloped land at the site in the Gatwick Greenspace Partnership (formerly the Horley/Crawley Management Project). Such land as is included should be assessed for potential enhancement.</p> <p>The final concern of the District Council is that the boundaries of the site should have soft edges. Together with such soft edges should be reduced densities at the boundaries which should help to lessen the impact of the proposed development on the area in general.</p>
Tim Hoskinson	Savills	Wilky Group		<p>This section of the plan highlights concerns regarding a potential imbalance between jobs and housing arising from population increases outstripping economic growth, which may, in turn, exacerbate out migration or out commuting, with people having to move or commute out of Crawley to secure employment.</p> <p>As highlighted in the submitted evidence base for Gatwick Green and in paragraphs 20 to 25 of this document, the proposed jobs growth associated with Gatwick Green would complement existing employment provision in the area and would help to facilitate a more sustainable balance of jobs and population growth by providing more local employment, with opportunities for more people live and work locally rather than commuting.</p>
Robin Shepherd	Barton Willmore	Mayfield Market Towns Ltd		<p>SEE FULL REP - Attached at Appendix 1 is an Updated Housing Requirements Assessment produced by Barton Willmore using the widely respected Chelmer Model. The Housing Requirements Assessment is updated from the original assessment appended to our representations on housing growth options for Crawley submitted in March 2012. It considers two demographic scenarios and finds that assuming zero net migration an annual average of 512 dwellings are needed in Crawley. However, the second scenario, based on a continuation of short term net immigration trends, results in an annual average need for 850 dwellings in Crawley. It is considered that the two scenarios provide an absolute minimum and a robustly justifiable higher level of housing need for Crawley.</p> <p>Tetlow King has investigated the issue of the need for Affordable Housing and this matter is set out in detail in Section 3 of these representations. If Affordable Housing were continued to be sought at 40% of all new residential</p>

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				<p>development, as in the current Core Strategy, this would suggest the need to build a total of 205-955 new homes each year within Crawley to provide enough affordable housing to satisfy the low and high requirement identified in the SHMA. The Crawley Locally Generated Housing Needs Assessment identifies that a range of between 204-252 affordable dwellings per annum is required to meet affordable housing needs, which is very close to the actual 'supply led' housing target set out in Policy H1. The supply of affordable housing is likely to be adversely affected through the 'supply led' approach referred to below. It is clear, that in order to make a significant contribution to the delivery of homes to meet the growing need for affordable housing, as well as general market housing, Crawley Borough Council will need to consider options outside its boundaries.</p> <p>A New Market Town, between Sayers Common and Henfield on the A23, would provide the best opportunity for delivering improved levels of affordable and other forms of low-cost housing within a mixed and sustainable community. A feature of successful New Towns and more recent new settlements has been a variety of house types and tenures to ensure choice is available and to foster a mixed and sustainable community. A new market town has the ability to deliver more affordable homes than other options, and importantly can provide them in a more sustainable way than, for example, urban extensions.</p>
Robin Shepherd	Barton Willmore	Mayfield Market Towns Ltd		<p>SEE FULL REP - Lack of Capacity in Crawley to Meet its Housing Need</p> <p>The Preferred Strategy Consultation Draft Local Plan acknowledges that Crawley cannot wholly meet its housing needs within its boundary. Meeting objectively assessed housing need is a fundamental requirement of the National Planning Policy Framework (NPPF).</p> <p>Policy H1: Housing Provision is based on a supply led approach of delivering an annual average of 236 dwellings.</p> <p>In addition to the two demographic led scenarios, the Updated Housing Requirements Assessment considers the dwelling led scenario proposed by Crawley Borough Council based on Policy H1 and its requirement of 236 dwellings per annum. The Updated Housing Requirements Assessment summarises the damaging implications of the 'supply led' preferred option in that it would result in an average annual net out-migration of 588 people, result in very low population growth and would result in very low labour force growth.</p> <p>The above illustrates the importance of Crawley Borough Council proactively identifying how and where the housing needs that it cannot meet with its administrative boundary can be met.</p> <p>The Preferred Strategy Consultation Draft Local Plan does not address how Crawley's unmet housing needs will be</p>

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Housing Comments
------	--------------	---------------	---------	------------------

met outside of the Borough boundary. These needs are considerable and, excluding an allowance for windfalls that

Name	Organisation	On Behalf of:	Policy:	Housing Comments
------	--------------	---------------	---------	------------------

some of Crawley's growth requirements over this plan

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Housing Comments
------	--------------	---------------	---------	------------------

of the Plan a specific requirement. It is noted within the Housing Chapter that the Council considers the Borough to be constrained in respect of its capacity for future growth, while at the same time acknowledging that the need for new housing is significant (Page 79).

Based on a continuation of the existing demographic patterns, the Council has identified that this would mean

Name	Organisation	On Behalf of:	Policy:	Housing Comments
				<p>carries the same policy designation as the land that was and thus could contribute towards the wider objectives of Policy NES 1 and NES 2.</p> <p>It is evident from both Policy H2 and the Diagram included within the Housing Chapter, that the land is currently excluded from the area shown as Key Housing Sites, with the former Core Strategy Allocation being superseded in time by this new Diagram within the Local Plan. As the site could deliver in excess of 75 dwellings, the Diagram and Policy H2 should be amended to include this additional residual area and the capacity added to the overall target within Policy H1.</p>

Michael

Simknins S,g72191TJ0I

Name	Organisation	On Behalf of:	Policy:	
------	--------------	---------------	---------	--

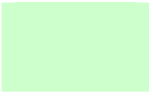
Name	Organisation	On Behalf of:	Policy:	Housing Comments
				housing sites in the borough been treated with the same cavalier, steamroller attitude?

Category 6: Environment

Name	Organisation	On Behalf of:	Policy:	Environment Comments
Tricia Butcher	The British Horse Society		ENV11	Policy ENV11: Green Infrastructure This policy is welcomed and supported, especially "ii identify opportunities for enhancement"
Tricia Butcher	The British Horse Society		ENV13	Policy ENV13: Open Space, Sport and Recreation This policy is supported, although in the "Reasoned Justification" typologies list I would have liked to see the last point read "** Green corridors (e.g. public rights of way)"
Tricia Butcher	The British Horse Society			The two notable omissions I would draw attention to are the word "multi-use" in relation to public rights of way, and acknowledgment of/support for the West Sussex Rights of Way Improvement Plan (part of the WS Local Transport Plan).
Katherine Harrison	Surrey County Council		ENV1	The Local Plan refers to a Carbon Neutral Commitment on page 27 which states that, "The Crawley Carbon and Waste Reduction Strategy aims to make Crawley carbon neutral and zero waste by 2050...". Support for carbon neutral commitment is strongly supported and recurs through the vision, objectives and policies, however, the zero waste commitment is not again mentioned. Crawley

Name	Organisation	On Behalf of:	Policy:	Environment Comments
Ian Miller	Tinsley Lane Residents Association		ENV13	<p>diversion of CDEW from landfill in the locality and surrounding areas. This will also help deliver sustainable development by driving waste management up the waste hierarchy in accordance with PPS10.</p> <p>Tinsley Lane is a discrete residential area bounded on two sides by the Manor Royal Business District and separated from Pound Hill and the rest of Three Bridges by the railway line and Crawley Avenue motorway link road. Within these defined boundaries, and with a mix of housing styles, many dating from before the New Town, it has developed a village like community with a strong local identity which should be protected and enhanced within the Local Development Framework. The unique semi-rural characteristics of Tinsley Lane should thus be protected by designating it to be an Area of Special Environmental Quality.</p> <p>Shielded from the railway line by Summersvere Wood (protected Ancient Woodland and home to a range of wild-life) this area could be utilised as a valuable recreational facility by the addition of nature trails etc. There are also three sports fields (two leased byanco b0 x25anx of</p>

Name	Organisation	On Behalf of:	
------	--------------	---------------	--



Name	Organisation	On Behalf

Name	Organisation	On Behalf of:	Policy:	Environment Comments
------	--------------	---------------	---------	----------------------

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>I started looking at your individual tree related policies, like CH3 f) would be better to refer to numbers of new replacement trees of a specified size (e.g. 16-18cm girth) being related to the size of trees being removed e.g. 1 new tree per 100mm stem diameter of tree being removed.</p> <p>But these are details. Get a strategy first.</p>
David Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	ENV1 & ENV6	<p>SEE FULL REP - "On the matter of sustainability..." "...it is noted that that the Local Plan seeks to impose policy burdens on development which go beyond national standards..."</p> <p>"The NPPF states in paragraph 95, bullet 3 that:- When setting any local requirement for building sustainability, do so in a way consistent with the governments zero carbon buildings policy and adopt national standards."</p> <p>"...setting standards that go beyond Building Regulations is also contrary to the findings of the majority of the members of the standards working group that produced the report "A review of Local Standards for the Delivery of New Homes..."</p>
Sally Stallan	Horsham District Council			<p>Further to our discussions regarding the potential for renewable and decentralised energy in the area, we welcome the positive stance taken towards combating climate change and look forward to continuing to work closely with CBC in developing options for a decentralised energy network. Given the predicted rise in temperatures over the forthcoming years, particularly in the South East, HDC agree with the proposed approach to climate change adaptation and are hoping to adopt a similar approach in the HDPF. Again related to climate change, HDC acknowledge the outcomes of the Gatwick Diamond Water Cycle Study and the identified pressures relating to water stress in the south east. Given that changing climate conditions are likely to aggravate water conditions further, HDC welcome the pro-active approach taken to water conservation and again look to adopt a similar approach in our strategy.</p>
Tim Hoskinson	Savills	Wilky Group		<p>The policies in the environment chapter of the plan identify three priority areas where new development is expected to exceed national standards (low carbon energy, radiant energy, and water efficiency). Land to the east of Gatwick Airport is identified as a Priority Area for District Energy Networks, as shown on the accompanying plan. Policy ENV1 states that new development in this area will be expected to seek to make use of available heat from existing or proposed district heating and/or cooling networks and/or waste heat sources.</p> <p>The Wilky Group is concerned to ensure that Gatwick Green will be an exemplar sustainable development, anticipating future requirements in transport construction technologies, energy and waste management and</p>

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>biodiversity whilst being aligned closely with the employment, education and health needs of surrounding communities.</p> <p>To this end, particular attention has been given to potential sustainable approaches and a sustainability strategy for Gatwick Green, as set out in the evidence base previously submitted. The proposals will embrace a range of measures to minimise energy demand in both construction and operation, including the opportunity for a biomass-fuelled combined heat and power system to serve the development, with potential to serve Gatwick Airport also.</p> <p>By taking a considered approach to sustainable development from the outset, Gatwick Green can deliver a development that will be regarded as exemplary in its approach to:</p> <ul style="list-style-type: none"> - sustainable construction and landscape - the management of energy, waste and water - green infrastructure and biodiversity - transport integration - community health, education and well-being - anticipating future economic, social and environmental conditions - responding to a unique set of opportunities to create a world-class location for international business.
Elizabeth Burt	Savills	Crest Strategic Projects	Environment map, page 90	<p>This map identifies that the Kilnwood Vale site is covered by a landscape character edge designation. There does not however appear to be any identification or definition of what this is. The site is an allocated site for a new neighbourhood and has consent for approximately 2,500 dwellings. It is therefore unclear why this designation has been placed on the site and CSP requests its removal.</p> <p>The land known as land between west of Bewbush and Faygate is not identified to be covered by any environmental constraints or designation. It can be seen however that large areas surrounding and within the Borough which are currently undeveloped are subject to such designations. TFe are currently</p>

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Environment Comments
------	--------------	---------------	---------	----------------------

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>choose to exceed minimums it should not be enforced upon them through planning policy. SEGRO therefore strongly disagrees with the policy wording set out in ENV1. In SEGRO's view there is no sound basis for this.</p> <p>Bullet ii indicates that where it is not viable to achieve the required rating, it should be demonstrated that the equivalent overall carbon performance will be achieved, however it is not clear as to what is meant by this or how it is to be demonstrated. Further to which, if such requirements are likely to make developments unviable, it is unlikely that developments will be able to make an equivalent payment toward the Crawley Offset/Buyout Fund in lieu, resulting in development stalling indefinitely.</p> <p>In terms of energy assessments, clarity should be provided as to the requirements for an outline scheme where it might not be possible to provide the level of detailed analysis, as would be available for a detailed scheme.</p> <p>CBC should consider the costs of requiring developers to undertake and produce such a protracted set of outputs in support of an application and the Council should also undertake viability testing as part of the viability appraisal of the Local Plan in accordance with paragraph 173 of the NPPF.</p>
Jennifer Wilson	Environment Agency			<p>There is no mention of the Water Framework Directive within the Crawley Local Plan or how the LPA will make its contribution towards achieving its objectives with respect to the water bodies within or flowing through Crawley.</p> <p>The local plan (LP) includes a number of policies that will ultimately assist in progression of work under the Water Framework Directive (WFD). However, it is disappointing that WFD is not specifically referenced. Local Authorities have a general responsibility not to compromise the achievement of UK compliance with EC Directives. Failure to comply with WFD requirements may lead to the EC bringing legal proceedings against the UK.SEE FULL REP</p>
Jennifer Wilson	Environment Agency		ENV1	<p>We would suggest that the section relating to the paragraphs relating to this policy and the policy itself acknowledges the large savings from retrofitting existing stock. Savings can be derived from retro-fitting of existing homes and buildings through improved energy and water efficiency. Water demand management measures are simple and cheap. Measures to reduce hot water use will also reduce energy bills in existing dwellings.</p> <p>The evidence base for this change is referenced here: 1. The BERR Energy White Paper "Updated Energy and Carbon Emissions Projections", (Section 5) found at: http://www.berr.gov.uk/files/file39580.pdf shows that</p>

Name	Organisation	On Behalf of:	Policy:	
------	--------------	---------------	---------	--

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Environment Comments
------	--------------	---------------	---------	----------------------

not been mentioned in the policy, any pre amble or

Name	Organisation	On Behalf of:	Policy:	Environment Comments
				<p>The LPA can no longer add a planning condition stating that a licence is sought from Natural England and need to screen applications to determine their likelihood of impacting on European Protected Species & pay careful attention to mitigation measures proposed by the developer. Mitigation proposals need to be submitted to the LPA so they can either apply the three tests or show how the need for licences will be avoided.</p>

John Lister Natural
England

Name	Organisation	On Behalf of:	Policy:	
------	--------------	---------------	---------	--

Category 7: Infrastructure

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
Katherine Harrison	Surrey County Council			

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
------	--------------	---------------	---------	-------------------------

that development could impose on the wider highway network in the 2029 AM peak hour. The results of Stage 2,

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
------	--------------	---------------	---------	-------------------------

tree key personnel at high level and change culture.

We are really lucky with our new town tree cover, and rather take it for granted. We really need to look after it better into the future for all sorts of reasons.

The strategy needs to identify and iron out the main areas of discontinuity that exist at the moment. E.g. using development control as a systematic arboricultural process

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
				<p>There is no mention of the locally listed buildings in the area (as opposed to the nationally listed buildings, which are mentioned). Was there a reason for this?</p> <p>Extension of the conservation area IVCAAC supports the extension of the conservation area and sent a separate, detailed document about this on 29 November 2012.</p> <p>Area of Special Character IVCAAC supports the designation of the 'Arts and Crafts' houses in Rusper Road as creating an Area of Special Character. We think that Horsham should be alerted to this as some of the buildings continue into the Horsham section of Rusper Rd. (although there is one where the features have been covered with white plaster and blue shutters).</p> <p>Loss of protection? IVCAAC is sorry that the four large houses and gardens in Rusper Road north east of the Arts and Crafts style houses, which were previously in the area of Special Environmental Quality (a designation that is to be removed) may not be well protected. Do other policies give these houses protection from being knocked down and replaced by higher density housing that would be out of place in the road?</p>
Sally Stallan	Horsham District Council			<p>From the vision statement of Crawley 2029 we understand another aim is that growth will be sustainable and supported by an infrastructure plan that complements development. We note that one of the concerns raised through your issues and options consultation was the capacity of the existing highway network and its capability to manage further growth within and outside the borough, in particular, junctions 9, 10 & 11 of the M23 have been recognised as busy interchanges that may require upgrading. We are mindful of any development which could have a negative impact on our transport corridors by way of increased congestion. We therefore request that you keep both ourselves and West Sussex County Council as Highways Authority informed of any development proposals that may have an impact upon this location.</p>
Peter Mason	Tandridge District Council		IN3	<p>It is considered that as part of wider transport infrastructure enhancement, an extension of Fastway to East Grinstead should be investigated. Securing the extension of the Fastway system to Redhill was supported in principle, however, it is considered that the villages of Godstone, Bletchingley and Nutfield along the A25 in Tandridge District should be linked into Fastway at Redhill as a quality bus priority route corridor with appropriate measures being included such as public transport information boards, high quality bus stops with shelters, seating and real time passenger information displays. Similarly Smallfield should be linked into Fastway at Horley.</p>
Mike	NHS Sussex			SEE FULL REP - comments made in regard to CIL and

Name	Organisation	On Behalf of:	Policy:	Infrastructure Comments
Pritchard				healthcare facilities
Jennifer Wilson	Environment Agency		IN1	We note that neither flood defences/mitigation measures nor GI have been included within the definition of Infrastructure either as part of this policy or in the glossary. They should be, in support of your GI policy and from a flood defence perspective, as they protect dwellings.
Jennifer Wilson	Environment Agency		IN5	As above for IN1.
John Lister	Natural England			<ul style="list-style-type: none"> • New development should ensure there are existing or planned facilities and services (including transport, education and health services) to support a growing population. • Facilities and services should continue to be provided close to where people need them. • The railway links are a vital part of our town and the Local Plan should continue to support and encourage the upgrading of both Crawley and Three Bridges stations. <p>Natural England agree to all three points, as each would lead to a more sustainable pattern of development. Encouraging development within proximity to existing or planned facilities or services ensures there is a local and generally accessible option for new residents. Natural England support the enhancement of the railway links as a means of delivering sustainable transport.</p>
John Lister	Natural England		IN1 & IN3 & IN5	Encouraging new developments to be permitted where there is existing infrastructure, services, facilities (IN1) and where there are sustainable travel patterns (IN3) is supported by Natural England as this would encourage a sustainable pattern of development as highlighted within the NPPF. Furthermore the strategy within policy IN5 is to locate community facilities close to neighbourhood centres. These areas are often the more accessible areas for a variety of transport modes and so accessible for most people. Natural England note and support the reference within policy IN3 for the requirement of travel plans where development creates significant transport implications.

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				first paragraph of the reasoned justification) or whether it is an entirely new one. We believe that the review of the 2008 agreement should set in place the requirements necessary to mitigate the consequences of the airport handling 45 million passengers.
Jack Straw	Mole Valley District Council		GAT3	14. We note the reference to Gatwick's emerging new parking strategy in the second paragraph of the reasoned justification to Policy GAT3. It indicates that the strategy is looking to address the issues arising from a 40 million annual passenger throughput. There is an argument for the strategy to address the consequences of a 45 million throughput as this is what the airport operator indicates in the Master Plan is achievable by 2030. It would be appreciated if the Borough Council could take this up with the airport operator as work progresses on the parking strategy.
Peter Mason	Tandridge District Council		GAT1	<p>As far as the District Council is aware, it has not been demonstrated that the proposed expansion up to 45 million passengers per annum is compatible with the transport infrastructure and environmental character in the area, having regard to the likely level of traffic generation from the Airport and the adequate availability of alternative transport modes.</p> <p>The District Council is opposed, in principle, to a second runway at Gatwick Airport which could lead to those communities which suffer noise at present having increased noise. Noise impacts could increase significantly so affecting a number of communities in the southern part of the District. This would be unacceptable, and exemplifies the insuperable difficulties of further expansion of the Airport and, therefore, the District Council supports the operation of Gatwick Airport remaining as a single runway, two terminal airport.</p>
Peter Mason	Tandridge District Council		GAT2	It is considered that no action is required to deal with the possibility of a second runway beyond the requirement to safeguard land.
Peter Mason	Tandridge District Council		GAT3	One of the effects of Gatwick Airport on the District is that there is pressure for off-airport parking in the vicinity of the airport. The Council wishes to see any identified shortfall in provision for parking provided within the airport and accordingly the wording of the policy to include "airport parking will only be permitted within the airport boundary" is welcome.

Tim Hoskinson

Savills

Wilky Group

SEE FULL REP....As currently set out, the approach to safeguarded land in Policy GAT2 represents an unnecessary burden to the delivery of the Gatwick Green proposals, and we would urge the Council to seek to address this potential barrier to investment through a positive and proactive approach to formulating a suitable safeguarding policy in co-operation with the airport

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				Commission on airport capacity. As part of this work, the Wilky Group will seek to work with the airport owners and the Council to ensure that appropriate safeguarding boundaries can be drawn up to exclude the land that is not required for airport operational purposes associated with a second runway.
Mark Bewsey	Savills	Homes and Communities Agency	GAT2	Comment – The HCA has significant landholdings within the Gatwick Safeguarding Area. The land at Rowley Farm sits to the north west edge of the Manor Royal Business District. If the safeguarding designation was not in place, this land would be an ideal location for extension to the built up boundary.

Rob
Matthews

Gatwick
Airport Ltd.

GAT1

The Gatwick Master Plan (July 2012) outlines the future plans for the growth of the Airport to 2030 and with the airport potentially handling up to 45 mppa with its existing single runway / two terminal configuration. It incorporates the strategic aims and objectives of the Airport to meet future growth and anticipated demand, through developing the Airport and ensuring its safe and efficient operation. The Master Plan is prepared in consultation with Crawley Borough C0 -1 operwwwd ma(w)the(/ he t(y)0(. hn istakehw)the(olper))-de

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
------	--------------	---------------	---------	-----------------

Development of on-site energy centres.

The Master Plan shows that the projected growth in passenger traffic is achievable within the safe operational limitations of the Airport as a single runway / two terminal airport and will be balanced with appropriate mitigation of environmental impacts.

The current draft of policy GAT1 supports and protects the development of facilities contributing to the safe and efficient operation of Gatwick as a single runway, two terminal airport, as it expands up to 45 mppa.

The policy also seeks to ensure that any environmental impacts are mitigated and it makes reference to the Section 106 agreement which is in place to ensure sufficient mitigation is achieved.

Save for the following point GAL is, therefore, wholly supportive of policy GAT1.

The only point that GAL wishes to comment on is the reference to "Climate Change" in criteria (ii) of the policy. That is the need to "mitigate the impact of the operation of refe C

t of the Airpo'nds developmen t
 impacte thatrncl with infTs(hencl i)-5.udave fon

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				For the above reasons GAL considers that the reference to 'climate change' in criteria (ii) of the policy should therefore be removed.

Rob
Matthews

Gatwick
Airport Ltd.

GAT2

Draft Local Plan Policy

The current draft policy GAT2 seeks to continue safeguarding the identified land for a potential second runway against development that would be incompatible with the expansion of the airport and development of a second runway. The policy is worded exactly as the existing Crawley Core Strategy Policy G2.

The draft policy goes on to broadly identify minor works that may be permitted within the safeguarded area.

GAL supports the principl

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				prejudice to the current and future operational needs of the airport. This will also be demonstrated in the revised Car Parking Strategy. In conclusion GAL supports Policy GAT3 as proposed.

Rob
Matthews

Gatwick
Airport Ltd.

GAT4

In order for GAL to realise opportunities for commercial development and to achieve the anticipated economic growth benefits, greater flexibility in planning policy is required relating to land within the airport boundary, whilst not prejudicing the current and future operational requirements of the airport.

The current draft policy wording for GAT4 is as follows:

“Permission for the loss of airport-related office floorspace within the airport boundary will only be permitted if it can be demonstrated that it will not have a detrimental effect on the long term ability of the airport to meet the floorspace need necessary to meet the operational needs of the airport as it expands.”

The wording is limited to the loss of office floorspace. This is possibly a reflection of two recent developments at the airport where the Council has granted permission for office buildings to be changed to hotels, having been provided with evidence that the offices were surplus to existing and future operational requirements.

GAL fully support this policy and agrees with the principle of allowing greater flexibility for existing uses, in order to make more efficient use of land.

In addition, GAL also fully supports the requirement for any proposals for the loss of office floorspace to demonstrate that it would not prejudice the operational needs of the airport. The continued efficient operation of the airport and ensuring its ability to grow within agreed limits is paramount to GAL.

Expanding from these principles, GAL would also like to see greater flexibility for commercial use of other on-airport land and use of other on-airport land. This is supported by the current proposal (Use of other on-airport land for commercial use) and the current proposal (Use of other on-airport land for commercial use).

Appendix 3: Verbatim Representations

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				forward under the suggested alterations will also be tested against all other relevant policies in the Crawley Local Plan 2029, ensuring the development would be appropriate and sustainable.
Rob Matthews	Gatwick Airport Ltd.		NEW	<p>In accordance with paragraph 28 of Annex 2 of Circular 01/2003 - Safeguarding Aerodromes, Technical Sites and Military Explosives Storage Areas: The Town and Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosives Storage Areas) Direction (2002) - it is suggested that the plan should also include a new policy which covers aerodrome safeguarding requirements of developments. GAL suggests the following wording</p> <p>"Aerodrome Safeguarding</p> <p>Development must comply with Aerodrome Safeguarding Requirements to ensure that the operational integrity and safety of Gatwick Airport is not compromised."</p> <p>The supporting text would explain that aerodrome safeguarding as a statutory function, the purpose of which is to ensure development does not compromise the safety of aircraft operations.</p> <p>Developments within and close to Gatwick Airport will be subject to consultation with GAL Aerodrome Safeguarding to be checked to ensure it would not compromise safety. In the case of certain developments, there may be restrictions on height and the design of buildings to protect radar, or the landscaping of development to avoid development presenting a risk which could lead to the hazard of aircraft bird strikes.</p>
John Lister	Natural England			<p>Airport parking should be located within the boundary of the airport to reduce congestion and promote "greener" travel arrangements.</p> <p>Natural England support the encouragement of green travel arrangements.</p>

John Lister
Natural England

Gatwick should remain a one runway, two terminal airport.

This is not within the remit of Natural England

Name	Organisation	On Behalf of:	Policy:	Gatwick Airport
				of the natural environment within the area.

Category 9: Neighbourhoods



Name	Organisation	On Behalf of	Neighbourhood	Neighbourhood Comments
				<p>makes it ideal to attract skilled workers and a safe walking distance to Hazelwick School makes the site ideal for family housing.</p> <p>With new recreational facilities centred on Oakwood football Club, Tinsley Lane could become a distinct individual area of Special Environmental Quality of which Crawley could be proud.</p>
Collin Lloyd			Tilgate	<p>Thank you. I trust the document contains policies which are sufficiently robust to protect small areas of green space in residential areas from development. As an example of what I mean I cite the most unfortunate decision of the council's cabinet to make available for consideration for development the green</p>

Name	Organisation	On Behalf of	Neighbourhood	Neighbourhood Comments
Burgess				to have social housing in the area of Town centre.
Brenda Burgess			Three Bridges	Mixture of housing both Social and desirable.
Brenda Burgess			Three Bridges	Keep and conserve the Town hall as an historic building of Crawley and a representation of 60's architecture. Same for College tower. (This does not mean that we should not renovate the offices at some point)
Jenny Frost	Ifield Village Conservation Area Advisory Committee		Ifield	<p>General IVCAAC: pleased to see that:</p> <ul style="list-style-type: none"> • Ifield Station improvements are to be considered • Ifield Meadows (south and those in the conservation area) are given high profile • The Village Green is mentioned • No building outside the built up area boundary is to be permitted. <p>Locally listed buildings There is no mention of the locally listed buildings in the area (as opposed to the nationally listed buildings, which are mentioned). Was there a reason for this?</p> <p>Extension of the conservation area IVCAAC supports the extension of the conservation area and sent a separate, detailed document about this on 29 November 2012.</p> <p>Area of Special Character IVCAAC supports the designation of the 'Arts and Crafts' houses in Rusper Road as creating an Area of Special Character. We think that Horsham should be alerted to this as some of the buildings continue into the Horsham section of Rusper Rd. (although there is one where the features have been covered with white plaster and blue shutters).</p> <p>Loss of protection? IVCAAC is sorry that the four large houses and gardens in Rusper Road north east of the Arts and Crafts style houses, which were previously in the area of Special Environmental Quality (a designation that is to be removed) may not be well protected. Do other policies give these houses protection from being knocked down and replaced by higher density housing that would be out of place in the road?</p>
Mark Bewsey	Savills	Homes and Communities Agency	Northgate	Comment – The Kilnmead site falls within the Northgate area. This site is suitable for a residential development and should therefore be included as a

Name	Organisation	On Behalf of	Neighbourhood	Neighbourhood Comments
Mark Bewsey	Savills	Homes and Communities Agency	Three Bridges	Comment – The land East of Tinsley Lane falls within the Three Bridges area. The site is suitable for a residential development and should therefore be included as a suitable and deliverable site within the list for the Three Bridges area on page 185.

Name	Organisation	On Behalf of:	Document	Page /Para	Evidence Base Document Comments
------	--------------	---------------	----------	------------	---------------------------------

Manor Royal off Metcalf Way. The Household

Name	Organisation	On Behalf of:	Document	Page /Para
------	--------------	---------------	----------	------------

Name	Organisation	On Behalf of:	Document	Page
------	--------------	---------------	----------	------