

STATEMENT OF CONSULTATION

APPENDIX 3

Early Engagement - Preferred Strategy Consultation

PART 1

Who was invited to make Representations

PART 2

Representations received via questionnaire & Officer Responses

PART 3

Direct Representations & Officer Responses



PART 1

Who was invited to make Representations

The Council only consider comments by respondents who provide their names and contact addresses. In line with the Council's Public Sector Equality Duty, the Council will not accept representations, objections or comments that are deemed to be inappropriate, offence or racist. In general terms, a racist representation is one which includes words, phrases or comments which are likely:

- to be offensive to a particular racial or ethnic group;
- to be racially abusive, insulting or threatening;
- to apply pressure to discriminate on racial grounds;
- to stir up racial hatred or contempt.

Any objections and comments that have been seen to be inappropriate, offensive or racist have been removed.

The following “specific consultation bodies were invited to make representation

The Environment Agency
English Heritage
Reigate and Banstead District Council
Natural England
Network Rail Infrastructure Limited
The Coal Authority
Homes and Communities Agency
Highways Agency
Southern Water
Horsham District Council
Mid Sussex District Council
Tandridge District Council
Thames Water
NHS Sussex
Addaction
Adur Council
Afro Caribbean Association (ACA)
Age Concern West Sussex
Ahmadiyya Muslim Association UK
(Crawley Branch)
Albany Homes Limited
Alliance Planning
Alternative Learning Community Bewbush
AMEC Environment & Infrastructure
Arlington Development Services
Arun Council
BAPS Swaminarayan Santha
Barratt Southern Counties

Barton Willmore Partnership
Bell Cornwell Partnership
Bellway Estates
Black History Foundation
BME Ladies Health and Social Wellbeing
Association
BNP Paribas Real Estate
Bodhisattva Buddhist Centre
Bovis Homes Ltd
Bowyer Planning Ltd
British Humanist Society
Broadfield Christian Fellowship
Broadfield Youth and Community Centre
CAA (Civil Aviation Authority)
Cameo Club
Campaign for Real Ale
CBRichard Ellis
Celtic & Irish Cultural Society
Central Crawley Conservation Area
Advisory Committee
Central Sussex College
Chagos Island Community Association
(CICA)
Chagos Islands Refugees group
Chagossian Elderly West Sussex Group
Charles Chuch South East Ltd
Chichester District Council
Churches Together in West Crawley
Cliveden Properties
Colgate Parish Council

Community Development Organisation-
Sussex (CDO-Sussex) formerly Sussex
African Communities Project (SACP)
COPE
County Mall
Crawley and Gatwick Chamber of
Commerce
Crawley Bangladeshi Welfare Association
Crawley Baptist Church
Crawley Campaign Against Racism
Crawley Community Relations Forum
Crawley Community Transport
Crawley Community Voluntary Service
Crawley Educational Institute
Crawley Ethnic Minority Partnership
Crawley Festival Committee
Crawley Homelessness Forum
Crawley Homes in Partnership (CHiP)
Crawley Interfaith Network
Crawley International Mela Association
(CIMA)
Crawley Kashmiri Women’s Welfare
Association
Crawley Mosque (Sunni Muslim)
Crawley Museum Society
Crawley Older Person's Forum
Crawley Older Person's Forum
Crawley Portuguese Association
Crawley Shop Mobility
Crawley Town Access Group
Crawley Wellbeing Team
Crawley Young Persons Council

Cycling Touring Club
Deloitte & Touche LLP
Deloitte LLP
Development Land and Planning
Consultants
DevPlan
Diego Garcian Society
Divas Dance Club
DMH Stallard
DPDS Consulting Group
Drivas Jonas Deloitte
DTZ
East Sussex County Council
Elim Church Crawley
Epson & Ewell Borough Council
Equality and Human Rights Commission
Fairview Homes
Forestfield & Shrublands Cons. Area Adv
Ctte
FPD Savills
Freedom Leisure
Friends of Broadfield Park
Friends, Families and Travellers
Frogmore Property Company Limited
Fusion Experience
Gambian Society
GIP
GL Hearn Ltd
Guiness Trust Housing Association
Gulzar -E-Habib
Gurjar Hindu Union (GHU)
GVA
Harveys

Health Through Sport Action
Heathrow Airport Holdings Limited
Henry Adams
Hillread Homes (Sussex) Ltd
Hillreed Developments Limited
Home Builders Federation
Home Plans
Homes and Communities Agency
Housing & Planning Directorate
Housing 21
Hyde Housing Association
Iceni
Ifield Village Conservation Area Advisory
Committee
Ikra Women & Children Learning Centre
Inspire Broadfield (youth group)
Ismaili Council
Iyad Daoud
J. P. Whelan Homes Limited
Kashmiri Educational and Welfare Trust
Keniston Housing Association
Kenneth Boyle Associates
King Sturge LLP
Land Securities PLC
Lichfield Planning
Maidenbower Baptist Church
Maidenbower Community Group
Malaika Sussex Multicultural Women's
Group
Mid Sussex District Council
Shia Muslim Mosque
Miller Homes
Moat Housing

Mole Valley District Council
Mono Consultants Limited
Montagu Evans
Moroccan Community Association
Muslim Women's Forum
Nathanial Lichfield & Partners
National Car Parks
National Federation of Gypsy Liaison
Groups
National Housing Federation
New Hope Church
Northgate Matters
Outreach 3 Way
Palace Street Investments
Parish of Worth, Pound Hill and
Maidenbower
Parker Dann Limited
Paul Brookes Architects
Peacock & Smith
Pegasus Planning Group
Pembroke Residents Association
Persimmon Homes
PH2 Planning Limited
Planning Perspectives LLP
Portchester Planning Consultancy
Pound Hill Residents Association
Premier Planning Plc
Rapleys LLP
RDjW Architects
RenewableUK
RISE
Roman Catholic Churches in Crawley
Royal Mail Properties

RPS Group
RPS Planning Transport and Environment Ltd
Rusper Parish Council
Rydon Homes Ltd
Savills
Scottish Widows Investment Partnership
SEBA South East Bangladeshi Association
SEGRO
Seva Trust
Shared Intelligence
Shelter Housing Aid Centre
Shire Consulting
Sikh Community Centre Crawley & CPT
SIVA
Soka Gakkai International – UK
Southern Counties
Southern Housing Group
Sport England
Spurgeons
Sri Guru Singh Sabha
Sri Lanka Think Tank UK
Sri Lankan Muslim Welfare Association
St Paul's Methodist Church
Standerd Life Investments

Stanhope PLC
Stevensdrake
Stiles Harold Williams
Strutt & Parker
Surrey County Council
Sussex Police
Sussex Wildlife Trust
Sustrans
Swadhyay Community Project (SCP)
Talk Bewbush
Talk Broadfield
Tandridge District Council
Taylor Wimpey
Tetlow King
The Fairway Club (older people)
The McLaren Clark Group
The Miller Group
The Palace Street Group
The SIVA Trust
The Theatres Trust
The Vine Christian Fellowship
Three Bridges Forum
Three Bridges Free Church
Tinsley Lane Residents Association

TRY & Black History Foundation
Turley Associates
Turners Hill Parish Council
United Reformed Church
Vision in Youth Collective
West and Partners
West Sussex Access Forum
West Sussex Children and Family Centres
West Sussex County Council
West Sussex County Council
West Sussex Crossroads
West Sussex Drug and Alcohol Action Team
West Sussex Youth Support and Development Service
White and Sons
Woodland Trust
Woolf Bond Planning
Worth Conservation Area Group
Worth Parish Council
Worthing Borough Council
WRVS
WYG Group

The following residents, or other persons carrying on business in the plan area, were considered appropriate to invite representations from:

Y Bosseva
Mrs WJ Paton
Tricia Butcher
Tony Fullwood

Priscilla Lambert
Ms Lambert
Sue Carraher
Sunita Singal

Sandra Foxton
Sharon Vygus
Sam Bateman
Pamela Ruel

Rosemarie Jerome
Rosemary Benwell
Richard Thorburn
Richard Symonds
Rebecca Holt
Peter Brooks
Peter Smith
Paul Harrison
Nadine Terry
Julie Roberts
Mrs Sue Bristow
Shani Wheatley
Morag Warrack
Matt Leese
Stuart Mason
Louise Weekes
Lorraine Pateman
Lillian Kirby
Kim Elliott
Kaye Handman
Karen Hackwell
Janet Gilroy
John Cooban
Mrs JG Withall
Mrs J Sully
Janet Boniface
Jacquie Ballard
J Baker
John Baker
I Debruin
Graham Berry
Charlotte Hassan
Greig van Outen

Nicola Faulkner
Gareth Gates
Ms Frost
Jennifer Frost
Faye Bargery
Fatima Moseley
Dr Richard Phillips
David L Andreson
Derel Meakings
David Newcombe
David Covill
Chris Morris
Chris Bower
Charis Edwards
Paul Capper
Dr Bill Temple-Pediani
Brian Eastman
Brenda Burgess
Suzanne
Jean Austin
Armin Hartinger
Annette Gidman
Andrew Summers
Andrea Roberts
Mr D Hewardine
Mrs S. Chick
Owner/Occupier
Mike Reed
Sarah Smith
Miss V Kirby
Owner/Occupier
Owner/Occupier
Claire Rigiore

Mr D Phillips
Brian McLaren
J Hopcroft
Mrs J Gould
Bill Scatterly
Ruth Ganz
Owner/Occupier
Mr DR Withall
Mr MJ Steward
Colin Maughan
Susan Bradford-Smart
Tony Fullwood

PART 2

Representations received via questionnaire & Officer Responses

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PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 1: Vision	CBC Officer Response
Dr Bill Temple-Pediani	KTI Energy Limited	Compliance by the Plan with Section 110 of the Localism Act 2011	Noted
David Knevett	None	I would also like to see confirmation of the status of the allotments that lie within the proposed conservation area. This important resource should be clearly protected from any risk of development or change of use. I think it is an important asset for Ifield and for the proposed conservation area.	Noted. Many allotments are protected the Allotment Act of 1925. Protection of open space (including allotments) will be through: Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance. Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.
Jenny Frost, Secretary	Ifield Village Conservation Area Advisory Committee, IVCAAC	This is a comment on the whole of part 1. The introduction provides a clear picture of the town and its population. It identifies the complexity of the conflicting demands that will be made in the future. IVCAAC supports the objectives and the strategies that are proposed. Two minor points: a) there is no mention of commuting into central London (is this too small a percentage for the whole commuting population to warrant a mention?); b) the youthfulness of the population is explained, with the youthfulness being renewed by new births (p19), but later in Corporate Plan 5 you mention an 'increasingly elderly population' (p27) - is there a contradiction here?.	Comments noted. Crawley faces a significant growth both in the number of young people which is particular to Crawley alongside growth in the elderly population (to a lesser degree) in line with national trends. The spatial context of the local plan recognises the role of Crawley as the economic hub within the Gatwick Diamond and associated high levels of commuting from the wider area including Brighton and Hove, Reigate and Banstead, Mid Sussex, Tandridge and Horsham.
Tony O'Connor	Moat Homes Ltd	Sustainable development is critical to Crawley's continuing success.	Noted.

Name	Organisation	Topic 2: Character	CBC Officer Response
Nora Davies		I would like any new development to be more striking and innovative than the current design.	The plan requires high quality design, particularly through policies CH2 and 3.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 2: Character	CBC Officer Response
Mrs P Ruel	member of Forestfield & Shrublands CAAC but speaking as an individual	Q2--new buildings shouldn't look out of place. however if an area of 50's/60's grey dated buildings, then a refreshing new building is fine. Q3-That is assuming designating it as a 'conservation area' is the best thing to do to preserve it	Comments noted.
Nicola Hord		The map at the start does not show the listed buildings in Ifield. Are these shown on a larger map? (we are working from the on line documents).While IVCAAC agrees broadly with policy CH8, members would think there should be a mention of SCALE of any development i.e. that any development in or near a conservation area should be of an appropriate SCALE.	Listed buildings will be shown on the Local Plan Policies Map although individual properties will be hard to identify at this map scale. More detailed maps are available from the council on request for certain uses or English Heritage have an online interactive map that can be used. The scale of development is addressed in Policy CH3.
Jenny Frost, Secretary	Ifield Village Conservation Area Advisory Committee, IVCAAC	Please add a mention of Village Greens as part of the heritage - they are different from 'parks and gardens'.	Village greens are not a town planning designation. They are protected under the Commons Act 1965/2006.
Valerie Darnley		Ifield Brook Meadows (North and South) must be protected from development. it is a 'Beauty Spot' with unique views and landscapes. the 1947/48 map, on display at Crawley Town Hall clearly shows that the planners wanted to protect this area, thus providing Crawley residents especially the Ifield community-an area of recreation and heritage. "Greenway" runs through the Meadows and it would be on ideal Local Nature Reserve	Ifield Brook Meadows is proposed as a Local Green Space. See para 76/77 of the NPPF.
Richard W Symonds		Q2. Since the buildings in the New Town are already of a poor 1950's style- an up to date fresh new look would be exciting. The Town and Civic Halls are due for a facelift.	Comments noted. This will be addressed whilst preserving the built heritage that should be protected.
Patricia Harman		Q1. The out of town supermarkets have changed the nature of local parade shops, but does Gossops Green really need 5 takeaways out of 12 shops? Is a betting shop required? Q2/3/4. The number of poundshops and other cheap retail outlets are taking over the town centre, especially those that insist on spreading their wares along the pavement like a third world bazaar. The ghastly Queen's Square blot on the landscape should never	Noted. The local plan will seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality and viability. Noted. Although the Local Plan is able guide the uses that locate in the town centre to retain a strong retail presence, it has no powers to manage the individual retailers that locate in the town.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 2: Character	CBC Officer Response
		have been built. The high street should revert to two way traffic and the tatty market relocated. Pedestrianisation of a high street is a quick way to kill it and reduce the shops to estate agents and restaurants. The Broadway was the only dual carriageway in town but is now reduced to a bus only series of chicanes that does not allow two busses to pass each other.	
Brain Champion		It is important that local neighbourhood shops suit the looks of everyone who lives there. Bring back the butchers, bakers and greengrocers by making rents realistic	Noted. The local plan will seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality and viability.
Claire Underwood		I think that we should really protect areas which show Crawley's history	Noted. A number of designations exist and a review of Conservation Areas is currently underway and the council will be looking to designate new Conservation Areas in April.
Hajid Hussain		If the government or person involves who took this things assist planning the best for improve the town it is better	Noted. The local plan will seek to ensure that Crawley is planned positively as a place that people enjoy, and want to live, work, and visit.
Roselin Permal		New modern buildings do not have character. architecture not good eg Peglar Court	The Local Plan includes policies to ensure that developments are of high quality design and reflect the surround character.
Lambent		I believe to return culture where ever possible and practical/safe-think its very sad buildings such as old cinema in High Street is to be demolished and would be sad to see High Street changed beyond recognition	The Plan enables the pros and cons of development proposals to be carefully considered. In the case of the former cinema, the building had been significantly altered, the design of the scheme was tailored to reflect the period of the cinema and the Sussex House scheme will bring a number benefits to the town. Only ten residents submitted any comments on the planning application and not all of these concerned the loss of the former cinema.
Sharon Harris		Crawley is a working town with relatively either of historical interest: jobs before history	Noted
D Binderman		Not all of the existing town has good architecture, some of which could be demolished and replaced with more sympathetic and appropriate buildings in time with the town and local area. Signage and shop fronts should be included in this consideration	The Plan enables the pros and cons of development proposals to be carefully considered.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 2: Character	CBC Officer Response
Mark Harris		it is important that where we have conservation areas that more is done to keep them looking worthy of that name. the Brighton Road and High Street look very untidy and uncared for.	Noted. The Local Plan includes policies to ensure conservation areas are protected or enhanced.
W Jakes		It should be possible to encourage diversity whilst protecting special areas of interest	The Plan encourages development that takes account of its context and seeks to enhance it.
Ian Turner		I think that all Crawley need be rebuild all buildings and old and unfunctional	Noted
Petrow Turner		Very important to protect any area or building which tells the history of the town. pleased to hear that the museum is to be moved to the tree from Goffs Park	Noted. Designations relating to heritage within the Town have strict criteria that should be applied in order to ensure that the designations are not devalued through the designation of areas that are not worthy. The Council is committed to reviewing designations from time to time.
Pat Change		The area around Wilkos, Primark, Evans cycle, Lloyds band up to M&S also Lloyds to the church should be developed to get away from the '70's' style properties that exist at present	Noted
Andrew Keeley		Crawley council lies thorough their teeth. council have ruined crawley. people cut down trees, the do not get fined 10,000 pounds. crawley chop trees, council are not fined Â£10,000 per each tree	Noted. See Tree policy CH6: New development should retain individual specimens or groups of trees that make a positive contribution to visual amenity. Additional tree planting will also be required to mitigate the visual impact of the intensification of buildings, hard surfacing parking and boundary treatments.
Arshad Khan		Q4. it depends what is going to be built. Sometimes a building can add to the character or a skyline	Noted
G Brown		I agree that it is important to retain the character of various historical parts of Crawley, however it is also important to have new innovative, ecofriendly buildings that introduce new character	Noted. The Local Plan strikes a balance between ensuring that areas are conserved whilst encouraging environmentally friendly buildings that reduce their impact on Climate Change.
Su Austin		Q3. Where cost of preserving this is too expensive, the solution that helps interest the economic situation should take priority	Noted
D-B Holloway		new college needed existing facility is an 'eyesore' and according to students is inadequate for purpose	Noted. The northern part of the college campus is designated as a Town Centre Development Site on the Local Plan map. It is unknown how this area will be

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Name	Organisation	Topic 2: Character	CBC Officer Response
			redeveloped but one option is redevelopment for educational uses.
Mike Miller		take to control centre town if secure buildings are long empty and abandoned, put them for culture, art museum exhibition, other education information and for attractive centre	Noted. The council is looking to ensure that phase 2 of the Town Centre North redevelopment comes forwards in the near future.
Valerjus V		I presume Q3 relates to 'area of special character' on the maps. the neighbourhood concept with central shops and services-is very important the eastern section of NE sector seems to be deprived of these	The Plan strongly supports the neighbourhood principle through policies CH1 and EC9. The N E Sector site has constraints such as flooding, ancient woodland and roads which currently divide the area into three main areas. The masterplan and emerging layouts seek to create integration.
Rodger Baker		It all should blend in with conservation areas and not overshadow them	Noted. Policies in the Local Plan will ensure that any development preserves or enhances the character or appearance of Conservation Areas.
Simon Young		We will not know until these developments are carried out whether we could positively agree these questions. anyway my wife and I will not be alive by then (85 & 71)	Noted
Pat Robinson		Q2. I believe any new buildings should 'enhance' the existing character of the town. Lets face it, a lot of the current architecture is awful. This is an opportunity to 'experiment sympathetically'	Noted. The Local Plan asks for high quality design in new developments.
Clare Hall		Crawley High Street must remain with its 'special architectural interest'. Neighbourhoods vary in design which is excellent- should not have modern design buildings 'bottled on' in the name of improvements (eg Langley Green's coloured building is ghastly) Crawleys motto is 'I grow and I rejoice'-but do we now? will we in the future? I doubt it	The Plan requires developments to take account of their context, for example policies CH2 and CH3.
Mrs Patricia Tame		Crawley needs to improve in appearance, queen square need a make up	Noted.
Ian Millar		grass verges should be protected and maintained in order to retain their original purpose of 'softening' the town scape	The Plan seeks the retention of visually important structural landscaping and the retention or replacement of trees.
Mr F Halliday		In order to enhance the neighbour hoods, the grass verges and green should be protected. The 'Barack Block' in queens square is a recent	The Plan seeks the retention of visually important structural landscaping and the retention or replacement of trees.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 2: Character	CBC Officer Response
		development that does look out of place. It has ruined the square- should never have been granted planning permission-everybody hates it	The Plan seeks investment in shops suitable for modern day operators.
Mrs A. Halliday		newer buildings in the town centre (eg the business park near spindle way) have a poorly designed 'legoland' feel about them. Parts of Broadfield and Bewbush feel very bleak. The newer housing in lfield by Rusper Road is much more sympathetic in character	The Plan requires developments to take account of their context, for example policies CH2 and CH3.
Niall Mitchell		I have lived in Crawley for most of my life and been to school here. I would very much like for Crawley to keep the character that it has for future generations	The Plan requires developments to take account of their context, for example policies CH2 and CH3.
Rachel Warham		the character of the existing high street should be maintained and strengthened. I feel very upset that the council has allowed destruction of Bar Med/old cinema as was a historic building of beauty. This has greatly upset crawley residents	The Plan enables the pros and cons of development proposals to be carefully considered through the design and heritage policies. In the case of the former cinema, the building had been significantly altered, the design of the scheme was tailored to reflect the period of the cinema and the Sussex House scheme will bring a number benefits to the town. What remained of the original features was carefully recorded prior to demolition, in accordance with English Heritage guidance. Only ten residents submitted any comments on the planning application and not all of these concerned the loss of the former cinema.
Elaine Deehan		Crawley is a new town, new buildings in new areas should be new for the time built, not similar to current structures	The Plan requires developments to take account of their context, for example policies CH2 and CH3.
Phil Powell		I believe that any approved development should look as modern as possible and there should be no visual continuity, and if you look at the town centre there never has been. Special areas-depends on location size and historical importance-a case by case review	The Plan requires developments to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours. The case for designating new heritage assets will be considered on a case by case basis.
Simon Darroch		I think a newer town lends itself to a mixture of styles-not just a 'new town' style	Noted.
Mrs Flood		I was born in crawley before the existence of the 'new town' and I have seen the way over the years the character of the town has changed and not for the better. Old buildings have been pulled down and	The town has been developing over the last 66 years from a small market town to a settlement the size of a small city. This change has resulted in buildings, built according to the approaches that held sway at that

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Name	Organisation	Topic 2: Character	CBC Officer Response
		replaced by buildings that do not blend in with the surrounding area, in fact a complete miss mash of designs. Why was not the old high street developed sympathetically as Horsham has kept the carfax	particular time, needing to be of different sizes and scales. Design has also only been allowed to be a consideration for the last twenty years. Whilst the Carfax is at the heart of Horsham town centre, whereas High Street is on the edge, the historic street has received substantial investment and now has a good food/evening entertainment offer. The Sussex House scheme may draw additional customers towards High Street which will encourage further investment. The Plan incorporates a town centre first approach to the location of appropriate new retail development.
Mrs Margaret Rixon		Q2 GOOD modern architecture can fit into, and indeed enhance, existing localities	The Plan requires developments to be high quality and to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours.
Mrs Margaret Luetchford		The town centre needs to improve its look and feel, parking is often lacking and expensive	The Plan incorporates a town centre first approach to the location of appropriate new retail development. New investment would improve the town centre. Large-scale retail development will be required to demonstrate how access requirements would be addressed.
Kerry Manley		Too many old and good building have been destroyed in old crawley or altered in appearance and inappropriate development out of character put in their place	The Plan requires developments to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours. The case for designating new heritage assets will be considered on a case by case basis.
Mr Alred Tidey		I think anything to better our town is good	Noted. The Local Plan contains many policies to ensure development within the borough occurs in a sustainable way.
Carrie Bosley		Conservation is important but, taking the area at worth church as an example, this is a conservation area but the 'conserved' field next to the church in overgrown and serves no practical purpose. a sympathetic development around the church (as proposed a few years ago) could enhance the area and to benefits of the church and local residents (and users of the worth way)) by, for example, providing car parking and town halls	The Plan requires developments to take account of their context, for example policies CH2 and CH3.

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Name	Organisation	Topic 2: Character	CBC Officer Response
Neil Dobson		If buildings of specific interest should be preserved, why was it allowed to pull the bar med (old cinema) down, and I wonder what buildings will be next to be sold off for profit	The Plan enables the pros and cons of development proposals to be carefully considered through the design and heritage policies. In the case of the former cinema, the building had been significantly altered, the design of the scheme was tailored to reflect the period of the cinema and the Sussex House scheme will bring a number benefits to the town. What remained of the original features was carefully recorded prior to demolition, in accordance with English Heritage guidance. Only ten residents submitted any comments on the planning application and not all of these concerned the loss of the former cinema.
David Leonard Newble		Would be curious to understand what is considered 'special architectural interest or character'	This can relate to a range of factors that can individually or cumulatively give an area special interest.
Tammy Lai		Nightlife has gone in the centre. We need more nightlife, a hospital with A&E and more surgery's for doctors. If you build more buildings and attract more people the town need the A&E department back because at the moment its a joke you have to go to either Redhill or Worthing	Noted. The council has adopted a Town Centre first approach encouraging leisure provision in the town centre. The appropriate location of A&E facilities serving Crawley is a decision for the health service.
Mrs R M Ganz		The planning of Crawley over the last 30 years has been a COMPLETE DISASTER. glorious old buildings have been demolished and for example large warehouses supermarkets built on the land (asda). an unnecessary dual carriageway rd are the top of the 'historic' high school. Which itself contains a mish-mash of poor quality construction and architecture/buildings alongside historic ones. I could go on but just look around!	The Plan requires developments to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours. The case for designating new heritage assets will be considered on a case by case basis.
Robert Monteath-Wilson		Future development should be used in appropriate areas to introduce a more modern feel to areas of the town ie town centre where tired plain concrete buildings currently dominate	The Plan requires developments to be high quality and to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours.
Richard Bateman		Crawley is lacking in character so any character and period features should be protected. New buildings should reflect character and not reflect the existing town centre	Noted. Whilst new buildings are required to be of high quality in certain areas buildings will be required to be of similar appearance to preserve the character of an area.
Mrs Helen Hyde		Crawley has destroyed its previous character!!!! I prefer to pay to go to Horsham its a nice town all together	The town has been developing over the last 66 years from a small market town to a settlement the size of a

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Name	Organisation	Topic 2: Character	CBC Officer Response
		more character, less concrete jungle feel to it. Not everyone in 20 and wants glass and steel	small city. This change has resulted in buildings, built according to the approaches that held sway at that particular time, needing to be of different sizes and scales. Design has also only been allowed to be a consideration for the last twenty years. The Plan requires developments to be high quality and to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours.
Mrs Jean Calcott		We should move according to...	We believe this comment was not completed.
Mihirkumar Rawal		If these character can sustain the future and not the past then I agree	Noted
Charles		New business coming into town should not be hindered by what went before	Noted. The council supports sustainable economic development within the borough. The Plan requires developments to be high quality and to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours.
James Conboy		Please stop knocking down old building in Guildford/Horsham they have a mix of the old and new, which has been done tastefully. Why cant you make the lovely paving area outside the George Hotel continue through Crawley, down by the post office and current CBC town hall	Noted. The Plan has a town centre first approach to encourage new investment, including investment into the public realm.
Jacqui Robinson		Q1) Future development should be kept to a small scale. Large developments have led to poor community feeling and areas (such as Broadfield) were people are many of going	Noted. The majority of development across the borough will be of a small scale however the council remains committed to bringing forwards Town Centre North. The application of the neighbourhood principle has delivered successful neighbourhood with appropriate facilities.
R Woodland		Some of the new developments are ugly, generic looking buildings and no effort has been made to make them blend in. Horsham has more character than Crawley because they have made more effort to protect the original layout of the town and the buildings. We seem to be content to knock them down and lose any character we have in the town	The town has been developing over the last 66 years from a small market town to a settlement the size of a small city. This change has resulted in buildings, built according to the approaches that held sway at that particular time, needing to be of different sizes and scales. Design has also only been allowed to be a consideration for the last twenty years. The Plan requires developments to be high quality and to take account of their context, for example policies CH2 and

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Name	Organisation	Topic 2: Character	CBC Officer Response
			CH3. This does not mean that new buildings have to copy the features of their neighbours. The case for designating new heritage assets will be considered on a case by case basis.
Kelly Ojok		As a new town Crawley has few special buildings so it is important to preserve these to connect 'new Crawley' with its past. We are very lucky to live in a beautiful area with several outstanding views. These must be protected	Noted. The council has undertaken a heritage review and identified areas, buildings and views worthy of protection by designation.
H Ives		Although Crawley should protect 'special architectural interests', it does have an out dated look about it and needs to be brought into the modern days. It looks very drab and unwelcoming	The Plan has a town centre first approach to encourage new investment, including investment into the public realm.
Colin Maughan		In the original design of the new towns as a concept two principles have been lost. The garden city as designated by Parker and Unwin. In this respect some Crawley neighbourhoods have been more successfully maintained than others. The growth in car ownership has resulted in roadside verges being paved over to park them and many front gardens have gone for the same reason. This can also cause floods due to run off rather than absorption. The old town high street has been eroded especially when Asda was built. It is by the nature of gardening and landscape design that they are labour intensive and therefore expensive. There is a case for deciding as (very insensitively) in Croydon which part of the centre can be developed in a higher and denser way and becoming uncompromisingly urban. But in Crawley there seem to be rather negative free-for-all and no concept. I understand the CBC is wealthy so it can probably afford to keep the Garden City idea throughout the town or in selected areas. If this is meant by Q2 by 'existing character' is developers venacular where the buildings are bogus in respect of facade and design and the choice of materials - the materials are always universal to the UK and never Sussex Sandstone. I don't agree. I should like to see good examples of the work of modern architects as we sometimes see on the industrial	The Plan requires developments to be high quality and to take account of their context, for example policies CH2 and CH3. This does not mean that new buildings have to copy the features of their neighbours. The case for designating new heritage assets will be considered on a case by case basis.

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Name	Organisation	Topic 2: Character	CBC Officer Response
		<p>estates and to some extent at Gatwick Airport. Why do we think train architects if we are not going to use their skills. Respecting the existing character, which is largely new town design now, is a question of scale and architectural good manners, not of choice of materials and style-or retro period design. Not only is the aesthetic quality of most buildings designed since the new town was designed, but street furniture, lighting, seating, sculpture, paving and ploughing are mediocre or poor. This seems to indicate that there is nobody in CBC with an understanding of urban design or industrial design. There may be someone but they haven't made their mark. Someone simply gets the marshalls catalagoue out again. In Furnace Green and the bus station we have lost simple and rather chunky wooden benches which were in fair condition and not uncomfortable in favour of over elaborate, cold stainless ones mounted far too high from the ground level for comfort.</p>	

Name	Organisation	Topic 3: Economic Development	CBC Officer Response
Dr Bill Temple-Pediani	KTI Energy Limited	<p>Land owned by HCA immediately south of the proposed second runway should be planned for coherent residential/commercial/educational/ hospital development by Crawley Borough Council and Horsham District Council under a Joint Area Action Plan</p>	<p>This area is currently subject to safeguarding relating to a potential second runway and any associated land take. As such, it is not possible to assess the scope for development with any degree of certainty until such time as clarification is provided as to whether a second runway will be built, and the subsequent impact of this with regards to the status of safeguarding. Noise is likely to represent a significant constraint to housing development at this location, though Local Plan Policy EC1 sets out a commitment to explore the scope for further business development once there is certainty as to the status of safeguarding.</p>
Clive Gunn		<p>Q6-Although what other options are there? this doesn't say. some park areas, yes but residential, no. Q8- it is good to have retail outside town otherwise to have to go into town for places would be a very busy, more hassle, harder and /or dearer to park etc and</p>	<p>Noted. Noted. Government policy seeks to ensure that retail developments are directed to the town centre before other locations are considered. The evolving policy will reflect the NPPF approach to determining proposals for</p>

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Name	Organisation	Topic 3: Economic Development	CBC Officer Response
		<p>some shops possible smaller than they could be. Q10- protected but NOT expanded.</p>	<p>out-of-centre development, having regard to the sequential test and assessing impact of any out-of-town retail proposals on town centre vitality and viability as existing and planned. Noted.</p>
<p>Jenny Frost, Secretary</p>	<p>Ifield Village Conservation Area Advisory Committee, IVCAAC</p>	<p>We are in agreement with much of this policy. For people working in Manor Royal there is value in having some (limited) retail outlets nearby so that they can shop easily at lunchtime. Town centre workers are currently in a far better position to be able to do this than Manor Royal workers. The group of outlets near the amenity tip already serve this purpose to some extent. The limitation that the plan puts on retail space seems wise. IVCAAC therefore supports this part. We have concerns, however, about smartening up everything on the Manor Royal Estate. There are a range of small businesses working out of small shed-like buildings, which customers feel at home with just because they are of human scale, with no expensive frills. They are often known by word-of-mouth recommendations and offer excellent service. We would not want these lost in the interest of 'smart appearances'.</p>	<p>Noted. It is recognised that Manor Royal lacks facilities and services to meet the day-to-day needs of employees working in the area. To reflect the approach of the NPPF, the sequential approach and impact testing will be applied through the emerging policy approach, to ensure that out-of-centre retail proposals do not impact upon the vitality and viability of the town centre as existing, nor on proposals for its future development through town centre north. Manor Royal is a key employment destination in Crawley, though it is recognised that some parts of the estate are beginning to look tired. The approach of the local plan, drawing upon the Manor Royal Design Guide SPD, will seek to ensure development proposals in Manor Royal make the most of opportunities to enhance the overall environment at Manor Royal.</p>
<p>Richard W Symonds</p>		<p>Closer business and commercial links until the airport should be supported and encouraged. After 2019, a new runway (South) is very likely, and this will create greater opportunities within Crawley Borough Council- the boundary of which includes Gatwick. If Crawley achieves unitary and City Status (Eg Crawley and Gatwick City Council) this can only be to area benefit.</p>	<p>Noted. The local plan will promote sustainable economic development, though any decision as to the scope for considering unitary authority status is beyond the remit of the local plan.</p>
<p>Ronald Davis</p>		<p>Q6. Consider developing a trade fair centre which would bring in domestic and international (via Gatwick) interest. Q7. Consider Boris Bike style capability and better cycle lanes Q9. Ifield shops-past dodgy "home grown" present bookies NOT vital to the local community. the co op is excellent</p>	<p>Noted. The local plan will seek to promote sustainable economic development, with a particular focus on business at Manor royal, to reinforce the role of Crawley as a business-led employment destination. Noted. The local plan will seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality and viability.</p>

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Name	Organisation	Topic 3: Economic Development	CBC Officer Response
Brain Champion		Q.8 Space for a major retail outlet, eg John Lewis would be better sited on one of the many vacant sites off Manor Royal, available now, with room for parking. Does John Lewis really want a town centre site surrounded by poundshops, in 10 years time? it is rumoured that Ikea is interested in a similar site.	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan. The sequential approach and impact testing will be applied through the emerging policy approach, to ensure that out-of-centre retail proposals do not impact upon the vitality and viability of the town centre as existing, nor on proposals for its future development through town centre north.
Claire Underwood		We need a more exciting, vibrant Town Centre, not all poundshops and bargain basements. A lively market would help and try to make Crawley a destination town. Have a look at Chichester- a delightful mix of old and new, trendy and traditional.	The Council is working closely with Stanhope, its development partner, to progress proposals for the Town Centre North site, and to consider opportunities to enhance the environment elsewhere in the town centre.
Hajid Hussain		I think we need to help people get jobs so that will prevent homelessness due to mortgage	Noted. The Economic Growth Assessment has identified a significant demand for new employment floorspace in Crawley, and the local plan will play a key role in helping to facilitate this space to help provide jobs.
Lambent		West Green parade-needs better shops. if one goes to Ifield they have better shops	Noted. Although the local plan cannot dictate which shops choose to locate in the parade, it will seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality and viability.
Sharon Harris		In this financial climate anything that protects employment has to be a good thing	Noted. The emerging local plan policy approach will draw upon the findings of the Economic Growth Assessment (2013) which identifies a significant demand for employment and recommends that Manor Royal should be protected as a key location for business.
D Binderman		Crawley is all about the local industry and people it can attract: anything which helps that is good news	Noted. The local plan will plan positively to deliver sustainable economic growth that draws upon Crawley's existing strengths and supports local business.
Mark Harris		if economic growth is to be protected, it must be done efficiently. As needs change, redevelopment of the business, commercial and trading area does not need	Noted. The Economic Growth Assessment (2013) identifies significant demand for employment floorspace that is currently greater than the available land supply in

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Name	Organisation	Topic 3: Economic Development	CBC Officer Response
		to necessarily expand beyond these boundaries. the changes can be made within the existing land areas	Crawley. The local plan approach therefore seeks to maximise the use of available space within existing Main Employment Areas. It may however be necessary to explore the scope for new business locations to meet demand in the later years of the plan period, subject to there being certainty on the status of safeguarding and other policy issues.
Promodini		Must encourage more business into the town which will help the economy to grow	Noted. The local plan seeks to deliver sustainable economic growth, places a priority focus on Manor Royal as the primary location for business, and promoting broader economic growth in the other Main Employment Areas.
W Jakes		If we are to grow as a town economically, we need to ensure that the people living and working in the area have good quality services such as healthcare and retail opportunities.	Noted.
Petrov Turner		More work area give more income for town and better living in the town	Noted. The local plan will plan positively to deliver sustainable economic growth that draws upon Crawley's existing strengths and supports local business.
Giles Kolter		Crawley is a town with a thriving busy centre. Having County Mall there is the reason. so no out of town shopping mall place	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan. The sequential approach and impact testing will be applied through the emerging policy approach, to ensure that out-of-centre retail proposals do not impact upon the vitality and viability of the town centre as existing, nor on proposals for its future development through town centre north.
Pat Change		Office blocks should not be built unless existing ones are completely filled. these offices should be only built in areas as above	The EGA has identified that although much of Crawley's office stock is modern, some premises, particularly within the town centre, are not capable of accommodating modern business needs. The local plan approach will seek to encourage business development at Manor Royal and existing Main Employment Areas. However, it is recognised that there is significant demand for employment floorspace, and it may be necessary to look beyond identified sites to accommodate future need. This is recognised and

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Name	Organisation	Topic 3: Economic Development	CBC Officer Response
			reflected within the emerging local plan.
Jose Freifas		Do not kill the retail out of town, its needed	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan.
Andrew Keeley		Development should stay within the brown fill and empty units that exist and not use green sites	The local plan approach will seek to encourage business development at Manor Royal and existing Main Employment Areas. However, it is recognised that there is significant demand for employment floorspace, and it may be necessary to look beyond identified sites to accommodate future need. This is recognised and reflected within the emerging local plan.
Arshad Khan		Council does not protect neighbourhood. local plan does not recognise anything. council have destroyed crawley. council have turned crawley into concrete jungle	Noted. The emerging local plan approach specifically includes policies that will protect the neighbourhood principle to ensure that future development in Crawley is brought forward in a sustainable way.
G Brown		Q9. I would add the word 'promote' on the high results and competition from supermarkets have lost in our butcher, baker and greengrocers in the last 20years. Q6. maybe some area could have housing	Noted. Although competition cannot be a planning consideration, the policy approach of the local plan will seek to ensure that Crawley Town Centre remains competitive and viable, and that neighbourhood parades continue to meet the needs of residents. Noted. The emerging policy approach (informed by the EGA) will seek to protect Manor Royal for business development, though it is recognised that recent changes to permitted development mean that some office uses will be able to convert to housing without the need for planning permission.
D-B Holloway		Q7, 8 ,10. in each case attention and allowance for cars and parking must be a firms consideration.	Noted.
Valerjus V		develop small business	Noted. The local plan will plan positively to deliver sustainable economic growth that draws upon Crawley's existing strengths and supports local business.
Pat Robinson		Again you do as you want, does not matter what we say	Noted. Feedback from consultation has played an important role in shaping the development of the plan. Although it is not possible to reflect the views of all respondents in the final plan, all comments have been

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Name	Organisation	Topic 3: Economic Development	CBC Officer Response
			reviewed and taken into consideration.
Clare Hall		Q10. I sort of agree but we need to encourage new businesses to populate these areas. We don't want to be in the same situation as we are with Manor Royal, where there are vast areas of empty space. If this means releasing this space for 'quality' retailers that will bring people into Crawley, this should be encouraged	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan. It is also recognised that there is a significant demand for business floorspace in Crawley, and for this reason the local plan seeks to prioritise Manor Royal for business use.
Mrs Patricia Tame		With the proposed NE Crawley development the Town Centre will not be suitable in its present format. The business district must be protected in order to provide a guarantee a range of employment sectors/skills with the new development	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan. It is also recognised that there is a significant demand for business floorspace in Crawley, and for this reason the local plan seeks to prioritise Manor Royal business use. In light of the council's evidence base, any proposals for out-of-centre retail at Manor Royal would need to be robustly evidenced.
Peter Goodey		Tilgate business park should never have been built	Noted.
Ian Millar		Manor Royal must look like a high quality business district to attract high quality businesses that bring employment to the town. Gatwick road etc should be smartened up by eliminating the proliferation of ugly signs and adding trees and landscaping. Small industrial units are also required and provision for these should be off the main artericos. low cost improvements should be implemented IMMEDIATELY by reducing advertising signs and planting trees to hide unattractive units	Noted. Through the local plan and Manor Royal Design Guide SPD, the council is seeking to work alongside the Manor Royal Business Group, business, and developers, to help bring about an improvement to the overall environment at Manor Royal.
Mr F Halliday		Important for local economy and job creation	Noted. The local plan will plan positively to deliver sustainable economic growth that draws upon Crawley's existing strengths and supports local business.
Niall Mitchell		too much 'out of town' development sucks the life out of the town centre as it is places such as the Broadway are very run down with far too many charity shops/pound shops/ short lease businesses	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan. The Council is working closely with Stanhope, its development partner, to progress proposals for the Town Centre North site, and to consider opportunities

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			elsewhere in the town centre to promote its retail offer and aesthetic environment.
Elaine Deehan		I would hate to see Crawley as another 'Purley Way'. There are enough areas for growth as above. Tourism should be encouraged-shopping/parks/rail and airport links	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan.
Simon Darroch		Just get anything into the town that you can, and don't just focus on high-tech jobs. Unskilled labour is just as important for the economy. Henry Smith and myself are working together on my national 1000 page business plan much of it could be adapted to place industries in Crawley	Noted. It is recognised that Crawley has a diverse economy that provides a range of employment opportunities. The Economic Growth Assessment (2013) has forecast growth in Crawley's economy, and identifies significant demand for employment floorspace in Crawley over the plan period. Based on this evidence, the role of the local plan will be to help direct employment to the most appropriate and sustainable locations.
Mrs Flood		Some of town retail is useful, but should not dominate/badly affect town centre. Quite a few parade shops have closed over recent years-can this be helped? Good to grow town centre/attract big names to pull people from out of town	Noted. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan. Further, the Council is working closely with Stanhope, its development partner, to progress proposals for the Town Centre North site, and to consider opportunities to enhance the environment elsewhere in the town centre
Mr C W Lusby		Q8. People go to outer town shopping areas because parking is FREE. so to encourage people back into town centre shops-reducing or scrap parking charges introduce park and ride as in Horsham-fantastic	Noted.
Mrs Margaret Luetchford		Q7 The town should look smart as possible everywhere. Q10 Housing may be more important in the future and Tilgate Forest Business Area must not be allowed to encroach further on the forest	Noted. The Council is working closely with Stanhope, its development partner, to progress proposals for the Town Centre North site, and to consider opportunities to enhance the environment elsewhere in the town centre Noted. The area outside the built up area boundary is the rural/urban fringe where proposals must meet the criteria of policy CH9 which supports proposals which respect the character and role of the area.
Mrs Lewin		Q8 Large companies should be encouraged to come to the area to improve employment-plenty of room on	The local plan seeks to promote sustainable economic growth, though to achieve this it is important that

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		manor royal for companies like Ikea!!	development is planned. Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan, which directs retail proposals to the Town Centre. Although some parts of Manor Royal are vacant, the local plan evidence base is clear that the use of Manor Royal for business should be maximised. The local plan therefore identifies Manor Royal as the key location for business use, with other employment generating uses considered where they would support the overall business role and function of Manor Royal.
Kerry Manley		roads within manor royal are often in poor state of repair. traffic is often gridlocked around manor royal from 4.10-6pm	Noted. The transport network is the responsibility of West Sussex County Council.
Mr Alred Tidey		I believe industry should be located away from residential areas to prevent pollution and noise intruding into peoples homes	Noted. This reflects the emerging approach of the local plan, which seeks to protect the amenity of existing homes, and is particularly recognised in relation to policies relating to air quality, noise, and amenity.
Mr P Robinson		Northgate surgery being moved is a disgrace. I go there and have not been asked, I only found out when I read it in the paper	Noted. This is beyond the remit of the local plan.
Neil Dobson		If you want to develop the town centre for shopping/retail, it seems prevse and allow retail development at (for example) manor royal. this encourages businesses to move away from the town centre (eg curry's) where parting in tree (ie manor royal)	Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan, which directs retail proposals to the Town Centre. Although some parts of Manor Royal are vacant, the local plan evidence base is clear that the use of Manor Royal for business should be maximised. The local plan therefore identifies Manor Royal as the key location for business use, with other employment generating uses considered where they would support the overall business role and function of Manor Royal.
Dianne Kingshott		Brand names attract wider audience try and encourage them to come to town or bigger unit around manor royal. try and encourage small local affordable boutiques to come to town centre as Brands and boutiques attract wider audience	The council is working closely with Stanhope, its development partner, to progress proposals for the Town Centre North site, and to consider opportunities elsewhere in the town centre to promote its retail offer and aesthetic environment.

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David Leonard Newble		I agree with the smartening up of manor royal, but what it needs is more industry to be using the area it was built for not hotels	Noted, and support welcomed. The approach of the local plan, alongside the Manor Royal Design Guide SPD, will seek to ensure development proposals in Manor Royal make the most of opportunities to help enhance the overall environment at Manor Royal. The evidence base of the Economic Growth Assessment (2013) recognises that the core business function of Manor Royal is being eroded, and recommends that the estate should be protected for business use. This approach is reflected in the emerging submission local plan.
Mrs R M Ganz		Q10) I agree with the proviso that there should be NO MORE development or enlargement of the tilgate forest business centre. tilgate forest has already been encroached upon and is a natural resource, not only for crawley people but also for visitors to the area	Noted. The Local Plan seeks to promote economic development within the existing boundary of Tilgate Forest Business Park, but does not propose further expansion on the Main Employment Area. The area outside the built up area boundary is the rural/urban fringe where proposals must meet the criteria of policy CH9 which supports proposals which respect the character and role of the area.
Robert Monteath-Wilson		Q8) and in the town centre!! q9) how will this be achieved? need incentives for LOCAL business people	Noted. Noted. This is beyond the scope of the local plan
Richard Bateman		manor royal is in a terrible state and roads in particular need to improve. out of town retail has its place but should not be at the dominant of the town centre. other business areas should be flexible. there is no point having vacant business premises on land and struggling to find space for new houses	Although some parts of Manor Royal are vacant, the local plan evidence base is clear that the use of Manor Royal for business should be maximised. The local plan therefore identifies Manor Royal as the key location for business use, and would not encourage retail proposals in the business district. It is anticipated that the design and economy policies of the emerging local plan, couple with the more detailed guidance of the Manor Royal Design Guide SPD, will help deliver improvements to the overall environment at Manor Royal. Beyond Manor Royal, the local plan provides flexibility for a range of Economic Development at Main Employment Areas.
Mrs Helen Hyde		Q8) More local shops would be useful, where I live in maidenbower but big chains costas. McDonalds should be avoided. local businesses like cafes should be encouraged. what about a Saturday food market in the	Noted. The planning system is only able to guide the types of businesses locating in a particular area, but not the operators. Noted. The local plan will plan positively to deliver

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Name	Organisation	Topic 3: Economic Development	CBC Officer Response
		square in maidenbower? Q10) in the future, more people will want to live where they work as transport becomes more costly. employment potential is existed to prevent crawley from just becoming a commuter town	sustainable economic growth that draws upon Crawley's existing strengths and supports local business.
Dave Mathaway		Q9) whilst parade shop rents have to be realistic in current market it is felt by many struggling shop renters that they are being overcharged and thereby face unprofitable of their business	Noted. The terms of individual business rentals is beyond the scope of the local plan.
Mrs Jean Calcott		our feelings are our neighbourhood parade should mainly serve the needs of their local communities and at present, we are overwhelmed with fast food outlets, especially Tilgate and Furnace green, which is the area we live in, to the deliver shops like butchers, green grocers and reassemble mixed grocers shops. the area has a large elderly population and doesn't seem to justify finance offices and corrupt showroom when we do not have a bakers, evermore Tilgate they do not sell bread, filled rolls, soups and hot snacks	Noted. The emerging local plan will seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality and viability.
Eliz Mitchell		Retail business outside of town is fine if you drive and are young, we also need furniture and large electrical depots for us who don't drive and are ageing. towns seem to die because of these retail parks	Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan, which directs retail proposals to the Town Centre.
Charles		Manor Royal should also have a number of guest houses. Retail development should have a show room in the Town Centre	Noted. The types of uses being promoted will largely come forward through the private sector. The role of the local plan will be to ensure these are directed to the most appropriate locations in planning terms.
James Conboy		Local parades must not just become a collection of takeaway food outlets. These parades will only thrive through diversity. We do not want outdoor food courts	Noted. The emerging local plan will seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality and viability.
Jacqui Robinson		I agree but keep big business in Manor Royal if you can	Noted. The local plan will seek to promote Manor Royal as the primary business destination in the sub-region.
S Graves		Gossops green parade is full of takeaways which do not provide the balanced shopping needs of locals	Noted. The emerging local plan will seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality

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Name	Organisation	Topic 3: Economic Development	CBC Officer Response
			and viability.
R Woodland		Limit outside town retail development to try and preserve retail shopping in the town centre	Promoting the vitality and viability of the town centre is a key Government planning objective, and this is reflected in the town centre first approach of the local plan, which directs retail proposals to the Town Centre.
Kelly Ojok		it seems that the council is content to leave large spiralling industrial areas uncluttered and with room to breathe, ie, Manor Royal and insist on building more and more high density level buildings in the centre of town. the deal to clean the centre of town or its green areas sufficiently	Noted. The town centre represents a sustainable location in planning terms, as it is situated close to facilities, services, and transport links. But it is important that development is well-designed to ensure that it does not negatively impact upon the setting, character, and amenity of the area. The local plan policies will play an important role in ensuring that development is appropriate in this regard.
H Ives		Whilst economic growth is important so, too is quality of life. having a job is vitally important so whilst housing is required, in the main, current business areas should be supported to be available for potential and current employers. The town centre is a disgrace. Crawley should be offering a vibrant diverse shopping experience which reflects the population	The Council is working closely with Stanhope, its development partner, to progress proposals for the Town Centre North site, and to consider opportunities elsewhere in the town centre.
Chantel Wetton		I think the town centre should be Crawley's main resource for retail, as this would then encourage bigger retail businesses into Crawley as there are too many poundland/discounted shops which gives Crawley a cheapened look. I also think neighbourhood parades should promote a close neighbourhood community such as butchers, green grocers instead of take aways. There is far too many takeaways and the prospect of another two McDonalds being open in Crawley is outrageous. A local parade of butchers and greengrocers will encourage community spirit whilst also making it easier for elderly people to survive by themselves instead of relying on careers to take them to a big supermarket!	The Council is working closely with Stanhope, its development partner, to progress proposals for the Town Centre North site, and to consider opportunities elsewhere in the town centre. The emerging local plan will also seek to ensure that the ability of neighbourhood parades to meet the day-to-day needs of residents are not eroded, whilst allowing flexibility for a range of uses that promote their vitality and viability.
Colin Maughan		Mediocre, dated looking pretentious signs remind me of smug small minded councils. I don't think Manor Royal needs smartening up if that means tarting up as in the town centre by wasting money on poor street furniture, garish flowers, paving and sculptures. What Manor	Noted. The approach of national planning policy and the local plan will be to direct retail development to the town centre in order to promote the vitality and viability of the town centre. It is however recognised that Manor Royal does lack some facilities that would support the wider

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 3: Economic Development	CBC Officer Response
		<p>Royal and the other industrial estates might well need is improved and expanded retail areas so that people marooned there can do a little essential shopping and find good quality goods. Industrial estates are daytime neighbourhoods. The general opinion and time in CBC's attention to the neighbourhood shopping parades is welcomed but they have wasted a great deal of money by misguided changes and the specification of poor quality badly designed products from the Marshalls catalogues. Will the smarter appearance be maintained or will these parades have to wait for another expensive makeover in 2030? Reducing the council's shop rents which are too high for family businesses and essential services would have helped. At present people struggle to make a living from shop keeping.</p>	<p>business function of the estate, and through the Manor Royal Master Plan, Manor Royal Design Guide SPD, and Manor Royal Public Realm Strategy, it is recognised that a business hub could help to meet this need. The Council is committed to maintaining the investment made in the neighbourhood centres. Rents are not a planning issue.</p>

Name	Organisation	Topic 4: Housing	CBC Officer Response
Kevin Naris		<p>I believe that the council should be looking into building more council/housing assoc 2 and 3 bed family homes for this area instead of constantly building flats. building a larger number of family homes will allow those people needing more rooms to move up and freeing up the cramped smaller properties for the next generation of new families who are struggling in small flats, this will then free up the flats for the younger people on waiting list. I have seen in other area's that building of family sized homes has occurred but those were not council homes and they are still empty. In this economic climate building new homes that are to be sold will not affect the housing issue that the council is facing.</p>	<p>The Council's latest evidence of affordable housing needs the SHMA, identifies that the greatest need for affordable housing is for 2 and 3 bed properties. Comment with regard to freeing up of housing stock to facilitate movement through the housing ladder is noted.</p>
Marcus Ball	WSCC	<p>I can confirm that the County Council's land included as Key housing sites at Ifield and Tilgate is surplus to requirements and available for residential development</p>	<p>Comment noted and welcomed</p>
Ian		<p>Please put in writing in the detailed planning documents the requirements for the types of sustainable technologies to be included in new properties developed such as high levels of insulation, energy</p>	<p>Noted. The Local Plan will contain detailed guidance and support District Energy Networks and identified renewable technologies that have merit in Crawley. This will also be supported by a Supplementary Planning</p>

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 4: Housing	CBC Officer Response
		efficient lighting, sustainable heating and cooling (solar heating / PV). These should be shown on architectural drawings proposed by developers.	Document. Developers will be required to identify the measures taken to satisfy the policy requirements as part of their planning application.
Nicola Hord		Q12- Once an area is built on, IT CANNOT GO BACK HOW IT WAS. And what sort of place would the town be, a large apartment block? (we simply cant just keep on building throughout the future, maybe government should encourage growth across UK and not just south?)Q14- I would hate to live there, like the ASDA block with peace and quiet and fab views(?), but if its built on land anyway and others will live there...Q15- I cant really comment as dont know the plans so cant comment on whether that's too many or not. more places like the pembroke place I think is too much in a space and this is proven in through estate building all over UK that it doesnt work and a social problem in near future. Q16- Some of the 'affordable' housing ISN'T though really, maybe cheaper than some of the others but usually a small place, like a flat, and dearer than another not-so-new place bigger with garden. there still needs to be some though but just maybe better!	Comments noted with regard to new development and associated layout and design.
Jenny Frost, Secretary	Ifield Village Conservation Area Advisory Committee, IVCAAC	On the whole IVCAAC supports all the housing policies outlined. For H1. IVCAAC commented, in its response to the consultation earlier in the year, that the only way of combining both the protection of the open spaces and the housing needs of the growing population, is to allow some well designed higher density housing that is currently the case in Crawley. We are however reluctant to see any building outside the built up area as this would contradict the overall policy of having a compact town within the countryside.	Comments noted with regard to housing density and design and development outside the Built-Up Area. The area outside the built up area boundary is the rural/urban fringe where proposals must meet the criteria of policy CH9 which supports proposals which respect the character and role of the area.
Tony O'Connor	Moat Homes Ltd	I agree that there needs to be an appropriate mix of dwelling types to reflect local need. I do however wonder whether the reference to the provision of 'Lifetime Homes' needs to be stronger with perhaps a reference to the provision of wheelchair adapted homes.The stated requirement for 20% of new	Comments noted. All dwellings will need to comply with Lifetime Homes standards. There is no stated requirement for 20% of new affordable homes to be one bedroomed. Policy H3 requires all housing development to provide a mix of dwelling types and sizes to address the nature of local housing needs including a significant

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 4: Housing	CBC Officer Response
		affordable homes to be one bedroom does seem high. This may indeed reflect local need and the implications of the 'bedroom tax' and the ability to downsize. However a large proportion of one bedroom affordable flats has traditionally led to local housing management issues and has not been generally popular with social housing providers.	proportion of two and three bedroom affordable dwellings.
Valerie Darnley		There is never enough 'affordable housing'	Comment noted
Richard W Symonds		Housing in Ifield has been at expense of school playing fields and even schools themselves. West Sussex County Council has adopted a 'Rob Peter To Pay Paul' policy which has resulted in EVERY school playing fields being built upon-all or in parts in Ifield. This must stop.	<p>Comment noted.</p> <p>Protection of open space will be through: Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance. Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.</p>
Patricia Harman		Q15. I think around Thomas Bennett would be a good site for a block of 2 strong sheltered homes like my Brunswick Court. There are no sheltered homes in Tilgate which may have stopped Tilgate people from giving up their houses-which I did, would have liked to stay in Tilgate after living there for 30years.	Comment noted
Ian Meorow		Affordable housing for 'key' workers is a myth. in a modern economy every worker is 'key'. all social housing should be affordable.	Comment noted
Gary Peters		If immigration had been 'capped' in fair unstable Crawley New Town would not be in the position re housing shortage that we have today! as long as new houses go to local families then we agree!	No planning issues raised
Ronald Davis		<p>Q13. How was the figure of 240 arrived at and agreed? by who?</p> <p>Q15. this was done for both Ifield Junior school. 'the</p>	The figure of 240 dwellings per annum is based upon the identified capacity of the Borough to accommodate additional capacity., i.e. identified housing sites.

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Name	Organisation	Topic 4: Housing	CBC Officer Response
		towns open spaces should be protected. Q16. affordable housing will be council owned or private?	Comment with regard to protection of open space noted. Affordable housing is likely to managed by Registered Social Landlords.
Brian Champion		Q15. The 2500 extra houses will put further strain on Crawley's already overstretched infrastructure, water, sewage, health facilities (hospital), schools and leisure; most of which were 'planned' without thought for parking. Unless Gatwick is allowed to develop another runway by the time these houses are built Crawley will lose its major employment centre and become a ghost town with no body able to afford new housing. even if Gatwick grows Crawley's roads etc will need to be upgraded.	Comment noted
Hajid Hussain		I don't want to live in a town full of houses	Comment noted
Lambent		West Green should be for senior community. The young people should not be near off licences, pubs, supermarkets that sell cheap alcohol. At Pegan Court already this is happening and creating anti social behaviour-not enough being done to build accommodation for 55years and over. mixing young and old is a disaster.	Comment noted
Sharon Harris		I can understand a need for more homes as our population is expanding beyond control (government error) but then contradictory they are encouraging the right to buy. where is the sense in that - believe the freedom of choice to rent or buy is being taken away as changes suggest if people can afford to buy they should- a majority of rent payers are on benefits!	Comments noted
D Binderman		I see no advantage in the council interfering in normal supply and demand for housing	Comment noted
Mark Harris		The emphasis must be placed on council housing for rent. This might have the effect of reducing the drive to ownership and its negative consequences both for the areas and the owners whose financial situation take a wrong turn	Comment noted
Promodini		Too many flat build around the town Centre they do not go with environment and looks bad	Comment noted

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Name	Organisation	Topic 4: Housing	CBC Officer Response
W Jakes		The town centre area-Southgate in particular has had too many flats/social housing development and even the flats in the private sector are overcrowded. we don't need more people in Southgate/West Green	Comment noted
Ian Turner		The number of houses required should match demand based on economical development. The type of housing should match demand	Comment noted
Petrow Turner		expensive housing and older low cost housing crawley needs	Comment noted
Pat Change		Most important that open spaces should be protected for people and animals. TILGATE PARK IS AN EXAMPLE AND IS WELL USED BY COMMUNITY OF Crawley AND FURTHER AFIELD	<p>Comment noted.</p> <p>Protection of open space will be through:</p> <p>Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance.</p> <p>Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013)</p> <p>ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.</p> <p>All responses to this question have been noted and assessed whether it meets NPPF criteria para 77 or whether the Local Plan draft policies on open space and character (such as CH3, ENV1 and ENV4) provide the appropriate level of protection.</p> <p>The area outside the built up area boundary is the rural/urban fringe where proposals must meet the criteria of policy CH9 which supports proposals which respect the character and role of the area.</p> <p>Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible.</p>
Jose Freifas		Houses are needed prices are far to high	Comment noted
Andrew Keeley		There is plenty of brown sites that can be developed for housing (some industrial, please don't develop green	Comment noted

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Name	Organisation	Topic 4: Housing	CBC Officer Response
		fields and open spaces!!	
Arshad Khan		protect Crawley green space. there should be no house built. council have gone mad. council does not care about affordable homes. council are liars. council is destroying crawley but turning it into concrete jungle	Views noted. Protection of open space will be through: Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance. Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.
G Brown		Q13. Who works this out? what about empty properties? eg Pembroke estate or opposite station Q16 should depend on council waiting list Q14/15. reschedule empty office blocks eg. station area	Comment noted. The figure of 240 dwellings per annum is based upon the identified capacity of the Borough to accommodate additional capacity., i.e. identified housing sites.
J Ramsay		Character of neighbourhoods destroyed by this mixture of housing. nobody benefits	Comment noted
Valerie Owen		Housing should take into account people that are unable to buy or part buy, so lets have more housing for rent please for younger people, unmarried younger people, people should have to share not be put into three bed houses. also putting younger persons with children upstairs flats is not fair to person living on ground floor flats, as its not fair to them having people saying they are making to much noise. this is a problem for people who buy flats from council	Comments noted.
Rodger Baker		Even greater emphasis should be put on affordable housing as there is an enormous need for this. bring back council housing for start!	Comments noted
Simon Young		I am concerned about the erosion of school land to housing development	Comment noted
A C Scott		The term 'affordable housing' is meaningless. either the housing is well built to a price or it is jerry built. there	Comments noted

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Name	Organisation	Topic 4: Housing	CBC Officer Response
		should be more emphasis on different methods of house construction utilising more eco friendly materials etc	
Sally Mill		Not every development that includes housing should included 'affordable housing'. Such housing is not suitable in areas where larger, detached houses are built	Comment noted, the Council's approach towards housing delivery is to ensure that it can be accommodated in all new housing development. Off-site provision will be required for sites of 5 dwellings or less.
Pat Robinson		Waste of time doing this you will do as you want anyway	Comment noted
Rachel Comingall		me and my husband are not allowed a council house as we earn too much but we cant get a mortgage as we need 35k deposit!!!! help!!!!	Comment noted, the Council is trying to provide a range of affordable housing tenures including 10% low cost in addition to 30% affordable housing.
Clare Hall		Can not comment on most of the key housing site. I have highlighted the two colleges as my concern would be against the use of playing fields. I also believe if opportunities exist to redevelop existing sites for housing these should be considered	Comment noted
Christine Partleton		Far too many houses for Pound Hill	Comment noted
Mrs Patricia Tame		the annual figure of 240 houses is too high. The town centre MUST remain retail not residential. 2560 =1900=2500 (Kilnwood Vale)=6960!! These are houses, how many people? How many cars? The proportion of 'affordable housing' must remain the same and not vary	Comment noted
Peter Goodey		Housing shouldn't be at the expense of green space	Comment noted
Ian Millar		We need to provide affordable housing for people working in Crawley but not for the rest of the county. We also need to provide aspirational housing to keep those who work hard to improve their quality of life and have rate payers to subsidise that low cost housing. A good mix of housing styles is thus required but with the proportion of affordable housing varied according to the scale of the development	Comment noted. Comment with regard to house mix and affordable housing noted
Mr F Halliday		Bearing in mind that Crawley is restricted by finite boundaries that contain dense housing, building over 240 houses per year will result in even greater	Comment noted. The figure of 240 dwellings per annum is based upon the identified capacity of the Borough to accommodate additional capacity through identified

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Name	Organisation	Topic 4: Housing	CBC Officer Response
		problems for the future-where would houses go?	housing sites without significant detriment to the character of the town's neighbourhoods
Mrs A. Halliday		Pound Hill-North East Sector the town is now much too big from what was originally planned. 1900 dwelling are too many, especially as the large Horsham road estate, past Bewbush has already started	Comments noted. The North East Sector is an established housing commitment identified in the adopted Core Strategy. The new housing development to the South West of Crawley 'Kilnwood Vale' is identified in the West of Bewbush Joint Area Action Plan (2009)
Niall Mitchell		The north east sector development is too big. As it is crawleyavenue on balcombe road are too busy. Also having direct access to crawley avenue may make for a dangerous road junction	Comment noted
Elaine Deehan		Housing should not push further into the green belt, better to use existing sites such as Fairfield house	Comment noted. Fairfield House is identified as a key housing site.
Simon Darroch		An amount should be built in to demand and the revenue there is to build them. yes but flats only. in the town larger housing away from the town centre is better. I would also move firms above shops to premises on the indust and turn the offices above the shops in the queens square into bedsits and luxury apartments like in London, make it cosmopolitan and cool	Comment noted
Clive		Q16. The more 'affordable housing' lowers the area. No need for 'affordable housing' people are put off buying property next to 'affordable housing' because of the people given 'affordable housing'	Comment noted
Mrs Margaret Luetchford		<p>Q13. As many houses as possible should be built.</p> <p>Q14 Town centre housing is fine IF the site is suitable</p> <p>Q15 On the playing fields??</p> <p>Q16 Houses at affordable rents are essential</p>	<p>Comments noted.</p> <p>The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) assess the needs and qualitative or quantitative deficits and surpluses of open space in Crawley. This ensures that there is an adequate supply of open space for the current and future population (including sports clubs) and makes the best use of land by identifying open spaces better suited to other uses.</p> <p>This may involve enhancing the quality of existing open spaces and facilities to encourage greater use of them</p>

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Name	Organisation	Topic 4: Housing	CBC Officer Response
Mrs Lewin		More council bungalows for the over 65's-and council houses for those who were born in crawley still living with parents because they cant get onto council list or property ladder-'affordable housing' for who? this never includes people working hard for a low salary eg. care workers	Comments noted
Kerry Manley		Adequate parking should be provided with all new development most households are 2car family-some more	Comment noted
Mr Alred Tidey		great care is needed in locating housing in already congested areas to prevent problems of access and inadequate parking	Comments noted
Carrie Bosley		I think there should be more houses to be able to rent than buy as this is what is the problem more people buying so no one being able to rent in future, making minimal housing	Comments noted. Affordable rent is anticipated to form an increasing proportion of future affordable housing delivery, with rental levels set at 80% of market rental levels.
Mr P Robinson		My children will be still living with me when their in heir 50's they cannot afford to move out!	Comment noted
Neil Dobson		Q16 is ambiguous. I disagree that every development should have 'affordable housing'. in other words, I agree that the proportion should vary but that includes 'nil affordable housing'. I think market conditions should direct the type of housing in a development (plus local farmers)	Comments noted
Peter Nash		1) The boundary around crawley is far too tight. it is ridiculous that Horsham can build on the edge of Crawley whilst crawley is trying to squeeze more housing into a small area. crawley must insist on having extended boundaries. 2) disagree with building 1900 houses in NE sector: a) the balcombe road can not cope with extra trafficb) Gatwick is planning to develop southwards. the flight path for the new southern runway will be very close to the NE sector	Comments noted
Greg Jenkins		More parking around our housing area in Furnace Green	Comments noted
Denise Beer		There are many, many empty properties in crawley, these should be part of your future plans. do not allow	Comments noted

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Name	Organisation	Topic 4: Housing	CBC Officer Response
		landlords to is on these plots for their greed and gain. no more flats-please build some luxury 3,4 and 5 bed houses with large gardens in every borough-please!!!	
David Leonard Newble		More affordable/social housing is the priority at this moment in time as the towns population increases	Comment noted
Tammy Lai		Q16. I think affordable housing can create areas/draw certain crowds: I agree its necessary but not for all areas!!	Comment noted
Ronald Cooler		Please provide sufficient car parking	Comment noted
Mrs R M Ganz		A percentage of homes should be council owned to replace the council houses sold in the past. housing must take precedent over OFFICES. there are plenty of unoccupied offices in the area, while there is a huge demand for homes	Comment noted
Robert Monteath-Wilson		ensure existing town space/old buildings etc, are re used before green spaces are taken. ALL houses built should be to ecological standards with green source heating, solar panels top quality insulation etc..	Comment noted
Richard Bateman		The growth in housing must be supported by a growth in service. hospitals and infrastructure are already stretched, so keep it up. what do the council proposing about other 260 proportion not being built-where do peoplelive?	The infrastructure required to support the planned level of housing growth is critical and the Council will ensure that the necessary infrastructure (education, health, leisure, transport, sewerage) can be provided to support the identified level of housing growth.
Mrs Helen Hyde		Q13) we have to be realistic that housing must be provided, however, clever architecture and planning could prevent sprawl. Q15) I have recently moved here from Brighton and don't know these areas that well	Comments noted
Dave Mathaway		Q12) can not emphasise strongly enough that no neighbourhood should suffer additional housing to the extent that it either threatens it character or places too great a load on its services, infrastructure or transport flows	Comments noted, The impact of additional housing development on existing neighbourhoods has been carefully considered both with regard to the impact on their character and appearance and infrastructure serving that neighbourhood.
Mrs Jean Calcott		Nothing has been mentioned about the proposed housing in the furnace green teachers centres in furnace drive or has this been designated as only private housing with no affordable housing or	The land at Furnace Drive has been identified for Housing Development in the Council's Housing Trajectory given that the site has planning permission for 76 dwellings including affordable housing.

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Name	Organisation	Topic 4: Housing	CBC Officer Response
		designated services. as our shopping parade is one of the worst provide of a shopping centre for the elderly seeming as many residents have now had their service for no 2 cut from covering the top end of weald drive, even though it was only one more a morning	
Eliz Mitchell		We have too much empty office space in this town. empty offices lay where people could live	Comment noted, the Council is currently looking at the capacity of existing offices to accommodate new housing development, particularly within the town centre.
Charles		Most people will shop on line so there can be more housing developed in the town centre	Comment noted
James Conboy		Q13) The council should plan to build 500 homes each year. 240 should be the minimum. Q16) The proportion of affordable homes should apply to each and every development. Q14) There is much empty office space in the town centre that could be converted into living accommodation	Comments noted
Jacqui Robinson		I agree housing either council or affordable is needed. I have 4 children with no chance what so ever of getting their own properties. It REALLY does seem that non local people (I'm being polite) are taking our houses/flats etc	Comments noted
R Woodland		1900 houses at Pound Hill is too many-its like creating another small town and it will have little link with Crawley itself	Comment noted. The North East Sector has planning permission and is an established housing commitment identified in the adopted Core Strategy and forms a key part of the Council's housing land supply in the first five years of the plan.
Kelly Ojok		We cant continue to build housing in the centre of town. it will ruin the look and openness of the town. We have so many empty office blocks already in the town centre why can they not be converted for housing. as proven by other building developments in crawley people in affordable housing areas do not take proper care of their surroundings or the look of the building eg sheets for curtains etc	Comment noted, the Council is currently looking at the capacity of existing offices to accommodate new housing development, particularly within the town centre.
Rob Pullinger		Should not limit to 240	Comment noted

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Name	Organisation	Topic 4: Housing	CBC Officer Response
H Ives		<p>I agree that open spaces must be protected even if that means fewer houses being built. I do not know enough to make a judgement about the exact numbers. I see no reason why housing should no be provided above retail. I do object strongly to new office blocks being built to remain empty with homeless people sleeping rough in their doorways. That is obscene</p>	<p>Comments noted.</p> <p>The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) assess the needs and qualitative or quantitative deficits and surpluses of open space in Crawley. This ensures that there is an adequate supply of open space for the current and future population (including sports clubs) and makes the best use of land by identifying open spaces better suited to other uses.</p> <p>Protection of open space will be through:</p> <p>Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance.</p> <p>Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013)</p> <p>ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.</p>
Chantel Wetton		<p>I think 1900 is too many dwellings for Pound Hill North East Sector especially if the 2nd runway at Gatwick is being built! I also believe the town centre should remain retail. There are also too many flats being built we need some family homes as many families are overcrowded. People come to live in Crawley to settle down to have a family as it is such a prime location as it is close to London, Brighton and Gatwick. If affordable housing is built I think it should be made easier for people to apply for these as in this era, no young person can afford to move out and many parents are facing their children living with them until adult life, where as 20 years ago you would move out at 16-18!!</p>	<p>Comments noted</p>
Colin Maughan		<p>Every building in the town centre needs to be audited to record the utilisation of space much of it is under used or never used. This not only gives an abandoned, failing town impression but it is a loss of potential</p>	<p>Comments noted.</p> <p>The area outside the built up area boundary is the rural/urban fringe. Crawley's compact nature and attractive setting including accessible countryside for</p>

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Name	Organisation	Topic 4: Housing	CBC Officer Response
		<p>employment and trade to existing retailers. There is a need to convert some of the empty offices into smaller units or flats. Too large, fast development of housing encourages the participation of companies like Barrett who specialise in bog standard stereo typical units which are identical nationwide. There are far more interesting ways of providing housing such as zedbed in Sutton. The CBC should look at more adventurous schemes in Holland and Germany especially Frankfurt and also the work of Fitgrovia Society and the Sous Society in London and hopefully learn from their example. Some natural boundaries need to be drawn and housing development too far from the centre leads to car owners going shopping in East Grinstead and Dorking where the shopping centres are more diverse and vital. The establishment of natural boundaries of a Sylvia Crow (late) - like landscape architect would ensure that future growth of Crawley avoids ribbon development. This already seems to be happening at Faygate. Feeble gestures like preserving very small areas of ancient woodland as at Pease Pottage and turning Tilgate Forest into a golf course are sure signs of suburb aspiration ending up with miles of "subtopia" (see Gordon Cuslen's books and articles).</p>	<p>recreation is sought (see CH9 and CH11)</p>

Name	Organisation	Topic 5: Environment	CBC Officer Response
Dr Bill Temple-Pediani	KTI Energy Limited	<p>We support the initiative displayed by the Council to develop a renewable CHP scheme serving Crawley town and Gatwick Airport. We are in contact with Brett Hagen to build it subject to co-operation from West Sussex County Council providing requisite waste derived fuel from household and non-household sources.</p>	<p>Noted. Discussions with Dr Temple-Pediani are ongoing and the council is exploring all options to bring forward district energy networks.</p>
David Knevet	None	<p>Ifield station definitely needs improved rail links and facilities. More trains stopping here at weekends and evenings. However, more car parking and more frequent bus services will also need to be considered.</p>	<p>Noted. Ifield station features in Policy IN6.</p>
Ian Cooper	UK Power Networks	<p>Does your proposal for the creation include or impact the existing energy networks such as electricity or gas?</p>	<p>The proposed energy networks are currently in their development phase and would welcome input from UK</p>

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Name	Organisation	Topic 5: Environment	CBC Officer Response
		<p>I support the creation and use of district heating / cooling using CCHP equipment to reduce the environmental impact of an area and save cost over the lifetime of the scheme.</p> <p>Can you please supply a copy of the referenced report "WED02430R Decentralised Energy Study 4 110516_final" for review?</p>	<p>Power Networks,</p> <p>The study has been supplied.</p>
Mrs P Ruel	member of Forestfield & Shrublands CAAC but speaking as an individual	Particular attention should be taken to preserving the open green spaces and wildlife.	<p>Noted.</p> <p>Protection of open space will be through: Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance. Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities. The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) assess the needs and qualitative or quantitative deficits and surpluses of open space in Crawley. This ensures that there is an adequate supply of open space for the current and future population (including sports clubs) and makes the best use of land by identifying open spaces better suited to other uses. Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible. See Tree policy CH6: New development should retain individual specimens or groups of trees that make a positive contribution to visual amenity. Additional tree planting will also be required to mitigate the visual impact of the intensification of buildings, hard surfacing parking and boundary treatments.</p>

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 5: Environment	CBC Officer Response
Jenny Frost, Secretary	Ifield Village Conservation Area Advisory Committee, IVCAAC	Map of the designations of different parcels of land. IVCAAC objects to Ifield Village Green and the adjoining open space being designated solely as 'playing fields'. (This is the land bounded by Rectory Lane and the Road Ifield Green and is wholly within Ifield Village Conservation Area). Part is a dedicated Village Green - and the rest is multi-purpose (it operates also as Village Green, although it does not have that status). Part of this is hired out to the local football club. If the map remains as it is, the different status of this piece of land can easily be forgotten by new generations of planners at CBC.	Noted. This area is classified as a "Park and Recreation Ground" which covers a wide variety of uses.
Tony O'Connor	Moat Homes Ltd	I do agree with much in your environmental proposals. I do however see an issue with your proposal that your local standards in respect of the Code for Sustainable Homes should be one level higher than the national standard. I believe that this could have a detrimental effect on critically needed new development.	Noted. The proposed standards are not for whole level increases but use the standards within them to set carbon emission, and water consumption targets. These have been shown to be locally specific issues and the policy has been worded to allow developers flexibility when satisfying the policy requirements. The policy will also be simplified to resolve the confusion caused.
Katy Walker	Sport England	Policy ENV13 Open Space, Sport and Recreation seek to protect the continued use of existing open space, sport and recreational spaces. This approach is supported by Sport England. That said, the wording of the policy itself is confusing, containing double negatives and unclear wording. Bullets C and D of the policy need to be reworded as they lack clarity both from a grammatical perspective and also in content. Bullet D actually makes little sense at all when read together with pre text is states: "Proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless will not undermine the council's Green Infrastructure network." ?? Suggested amendment as follows: Policy ENV13: Open Space, Sport and Recreation Proposals that remove or affect the continued use of existing open space, sport and recreational spaces will not be permitted unless: a) An assessment of the needs for	Comments noted. This policy has been reworded.

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Name	Organisation	Topic 5: Environment	CBC Officer Response
		open space, sport and recreation, produced by or agreed with the council, clearly show the site to be surplus to requirements; and b) The site is unsuitable for re-designation to another form of open space, sport and recreation provision; and c) The loss of the site will not result in an overriding visual, amenity, environmental or cultural impacts; and d) ...	
Valerie Darnley		Wildlife is extremely important not only now but in the future, for future generations to appreciate. we are already losing certain birds because of over development it can not be allowed to happen 'carte blanche'	Noted. Wildlife, flora and fauna are protected under a range of green infrastructure policies in the Local Plan. All proposed allocations assess their impact on the environment before they are progressed.
Richard W Symonds		Ifield Brook Meadows and West Ifield generally- is seriously prone to flooding - as confirmed by the Environment Agency. There is considerable wildlife in the natural environment. No development should take place in or near such natural habitats	Noted. It is recognised that West of Ifield is subject to a number of constraints, and these will be considered in full as the council identifies the sites that will be consulted upon during the Additional Site Allocations consultation. Te Ifield Brook Meadows area is now being proposed as a Local Green Space. See policy ENV3.
Gary Peters		Yes build another reservoir before housing is built	Noted
Ronald Davis		Past council housing and facilities (bar provision for cars) was demolished sympathetically. recent council and especially private development has been crammed in with little time for local communities. consider building to a continental model of well planned communities run either by the council or reputable and responsible housing associates instead of outright private ownership	Noted. The council strongly supports the neighbourhood approach to development, building upon the town's New Town heritage.
Hajid Hussain		If we use cleaner energy it will cut pollution down such as solar power, wind power and even bio fuel and a lot more	Comment Noted. The council supports the use of cleaner energy.
Sharon Harris		I would assume (maybe wrongly) that all new developments would be energy/environmentally friendly and would hope wildlife would be protected by not developing every single inch of available land in Crawley	Noted. The plan includes policies relating to carbon emissions and efficiency. Development will be assessed on its impact on the environs. Protection of open space will be through: Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance.

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Name	Organisation	Topic 5: Environment	CBC Officer Response
			<p>Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013)</p> <p>ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.</p> <p>Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible.</p>
D Binderman		Any added pressure on the environment is bad for Crawley and its population. If is the case that the existing pressures could in fact be reduced from their present levels and as time moves on, reduced still further.	Noted.
W Jakes		We shouldn't build on any more green spaces- in lfield for example we have already built houses on the land near to the ifield schools. no more should be built	The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) assess the needs and qualitative or quantitative deficits and surpluses of open space in Crawley. This ensures that there is an adequate supply of open space for the current and future population (including sports clubs) and makes the best use of land by identifying open spaces better suited to other uses.
Giles Kolter		Can all new housing have solar panels installed as standard?	The Local Plan adopts a hierarchical approach and aims to have development use less energy, before asking them to supply energy efficiently, and then turn to renewable energy. It has been shown that a requirement such as the one you have requested is not affective and can lead to inefficient renewable energy schemes whilst also affecting viability.
Pat Change		I remember before the football stadium was built knifolkers were in the stream behind the stadium, birds such as these should be protected	Noted. Fauna is protected under legislation outside of the planning system.
Jose Freifas		Different birds should be further up for neglecting the name like ober fears countey's use	Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible.

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Name	Organisation	Topic 5: Environment	CBC Officer Response
Arshad Khan		Council is lying, fooling the public. council do not care for wildlife. council is fooling the public. council pretends it is on side of public. council is destroying crawleys green space	Noted.
G Brown		Q18. especially water saving eg used rain water to flush toilets, so we don't get more hose pipe bans. Q19. Not like stone court, balcolme road where all rubbish had to move on	Noted. Water rainwater harvesting systems can be expensive so it would not be appropriate to require this although our plan does actively encourage this. Noted.
Su Austin		we should actively protect our wildlife, natural environment and sites of historical/archaeological special invest. this will help retain character as well as enhancing the environment	Noted. Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible.
Valerjus V		Take care good architecture and stractions	Noted.
Rodger Baker		Encouragement if renewable energy needed and energy conservation	Noted. Using less energy is fundamental to our planning policies whilst renewable energy is now required when not in a heat priority area for district energy networks.
Sally Mill		All new houses should have solar panels for energy efficiency	Noted. This has been taken on board. Outside Heat priority areas renewable energy should be utilised.
Pat Robinson		You take no notice of what the people say	Noted.
Mrs Patricia Tame		Paying to park at Tilgate Park guarantees to keep so many people away. If you want current and new residents of all ages appreciate the new environment and open spaces- stop charging! It is only a means to make money. These new houses etc will be built surrounding the crematorium. why measures are in place to avoid 'smells' and to remain environmentally friendly? is the crematorium able to cope with the expected increase in business. What about the graveyards? On site of the abattoir it was rumoured or have been a site of authuaoux, is this this true? is it now safe?	The Cemetery site is not being taken forwards in the Local Plan.
Ian Millar		Crawley must be made an attractive place in which to live and not become a concrete jungle. If buildings are too close together with very small gardens there is no space for trees and green spaces. The town centre could have a higher density with 4-5 stories	Noted

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Name	Organisation	Topic 5: Environment	CBC Officer Response
Niall Mitchell		This very high cost of so called 'green' buildings outweighs any minor maintenance in running costs. Also maintenance costs are higher. New technology, such as solar glass windows, on existing buildings would be a more sensible approach	Noted.
Elaine Deehan		I agree strongly with question 19	noted.
Simon Darroch		All new property should be as energy efficient as possible, solar/wind/insulation-all new technology. Property that has everything might be more expensive but owners or tenant overheads while they occupy the building should be lower	Noted. The Local Plan includes a number of policies to achieve this backed up by the evidence base. A policy has also been incorporated to ensure existing properties are upgraded alongside any development that takes place.
Mr C W Lusby		Q18. Would solar power panels on council houses be considered to reduce energy use and be 'greener' this is being in use in Camborne, Cornwall	Noted. The Council is rolling out renewable energy sources on its properties and the Local plan supports this.
Mrs Margaret Luetchford		Crawley was originally developed sensitively leaving many trees, green 'lungs' and grass verges which made a very pleasant environment in which to live. Parking on verges is destructive and highly undesirable, maybe new development used underground parking	Noted. The council is addressing parking issues through its parking improvement schemes and the designation of structural landscaping, along with robust green infrastructure policies will help to retain the boroughs "green lungs".
Mrs Lewin		It is important to maintain access areas such as Tilgate forest and oak, Buchan park, Milton Mount-broadfield park, Goffs park	The area outside the built up area boundary is the rural/urban fringe. Crawley's compact nature and attractive setting including accessible countryside for recreation is sought (see CH9 and CH11)
Mr Alred Tidey		I am particularly opposed to the destruction of mature trees to make way for development and the retention of green spaces	Noted. A new policy relating to trees has been incorporated into the submission draft.
Neil Dobson		At first sight, a 'no brainer', but it is new town with will result in conflict which was not manageable	Noted.
Denise Beer		Crawley is part of West Sussex. one of the prettiest counties in the UK let's be a part of that heritage	Noted. Working with neighbouring authorities we have ensured a robust and inclusive approach to the wider area whilst preparing the plan.
Tammy Lai		The environment and natural architecture is vital for Crawley-definitely why I live in Crawley, not many towns maintain this level of landscape	Noted. Structural Landscaping shall endeavour to retain this.
Robert Monteath-Wilson		See Q17	Noted

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Name	Organisation	Topic 5: Environment	CBC Officer Response
Richard Bateman		I support the desire to reduce energy consumption and new dwellings, but the introduction of solar panels or wind turbines in my opinion is the wrong approach. rather than generate clearer energy on an individual basis to support our consumption, reduce the consumption. if you must do green energy make sure it looks good and isn't an eyesore	Noted. The plans preference if for District Energy Networks to be established ensuring a green supply of energy. In areas where these are not appropriate, technologies proved to be effective are required.
Mrs Helen Hyde		One of the attractions of maidenbower is its brook. the environment makes an area much nicer to live in. I saw a green woodpecker along the brook the other day- amazing!!	Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible.
Mrs Jean Calcott		Very pleased that waterlea meadow has been declared a protected environment as excellent and used by many residents which is very useful. the town must go congratulated on the forest in carrying out the work at Tilgate and the river mole behind waterlea meadow in the past 5yrs as we do not seem to have had any flooding this year, which has prevailed in many other Sussex areas	Comments noted
Charles		All new development SHOULD be beautifully designed so that future generations will protect these developments	The Plan requires developments to be high quality and to take account of their context, for example policies CH2 and CH3.
James Conboy		Q19) The need for new homes must take president. Crawley planners in the past have left a fine heritage of open space. The present planners must do the same for future generations	Protection of open space will be through: Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance. Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.
Jacqui Robinson		I live in Tilgate near to the lake and this area along with Buchan, lfield etc should not be developed by any purpose ie. Housing or retail. They are the only free things we can enjoy	The area outside the built up area boundary is the rural/urban fringe where proposals must meet the criteria of policy CH9 which supports proposals which respect the character and role of the area.

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Name	Organisation	Topic 5: Environment	CBC Officer Response
R Woodland		No wind farms in this urban area. keep wildlife except foxes which are becoming real pests	Noted.
Kelly Ojok		parks and allotment sites should be protected, cleaned and cared for	Noted. The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) assess the needs and qualitative or quantitative deficits and surpluses of open space in Crawley. This ensures that there is an adequate supply of open space for the current and future population (including sports clubs) and makes the best use of land by identifying open spaces better suited to other uses.
H Ives		Building should be done with a view to the future. Every building should be energy efficient and have enough parking (underground if necessary) Roads must be able to cope with extra traffic. railways must have more car parking	Noted. Policies have been included to ensure that buildings are sustainable and respond to the changing climate and reduce their energy demand. Parking standards take into account the predicted demand for housing and the accessibility of the site. Transport assessment has examined the impact of the development proposed in the local on the transport network to help ensure that any impact is acceptable.
Chantel Wetton		I think Crawley really needs to protect its wildlife! Tilgate and Buchan park are essential in attracting visitors but also for the residents of Crawley to enjoy! Tilgate is a great place to visit if you are just wanting a walk or looking at the nature centre and it would be shame to see Crawley's open spaces and wildlife destroyed for buildings	Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible.
Colin Maughan		As there are so many fine trees and shrubs in and around the town it is not a big issue but the manic devastation of some trees by some so called tree surgeons and changing the natural shape of others into lollypops is very regretably. When good tree surgeons are employed their work is hardly noticed. The incompetent companies say when I talk to them that they are working to British Standards often they are not, but all British Standards are lacking in vigour anyway. Now that CBC doesn't have its own labour force of horticulturalists and garedners the numerous roadside shrubberies should be rationalized so they don't appear	Policy ENV2: Biodiversity ensures that development minimises its impact on biodiversity and provides net gains where possible. See Tree policy CH6: New development should retain individual specimens or groups of trees that make a positive contribution to visual amenity. Additional tree planting will also be required to mitigate the visual impact of the intensification of buildings, hard surfacing parking and boundary treatments.

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Name	Organisation	Topic 5: Environment	CBC Officer Response
		abandoned. It may be possible to make use of volunteers to help the town in good shape. I mentioned over industrious tree surgeons above. it has been an improvement in the care of grass verges to reduce the manic, too frequent mowing. They are now in better health and there is no pretence of having garden type fronts/ areas all over the town along the roads.	

Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
Dr Bill Temple-Pediani	KTI Energy Limited	We strongly support the use of SRF produced by West Sussex County Council at Warnham to generate green electricity and heat for supply to Crawley town and Gatwick Airport. It is imperative the emerging West Sussex Waste Plan supports the Crawley Local Plan.	Noted. The West Sussex Waste Plan is under examination at the time of writing and we are waiting for the conclusion of this. The borough supports district energy network proposals developed by the council or private bodies.
Ian Cooper	UK Power Networks	The Environmental plan talks much about the development of infrastructure. I was expecting to see this reflected in the infrastructure plans in some way, such that the two areas would co-ordinate / cross-reference in their proposals.	The Infrastructure Plan sets out the provision of different types of infrastructure in Crawley and where appropriate the future plans of the infrastructure providers to help support the proposed levels of development. Where relevant there will be cross references to other parts of the plan.
Ms Rose Freeman, Planning Policy Officer	The Theatres Trust	Policy IN1 Infrastructure Provision The Vision on page 8 states under Experiencing Crawley that its leisure and cultural offer will be enhanced. This is not reflected in any policy. The fourth bullet point in the Introduction on page 10 includes community and cultural infrastructure. The Reasoned Justification of Policy IN1 on page 127 does not include the word 'cultural' and therefore does not reflect the Vision nor the Introduction. It may be that cultural facilities are included within the collective term 'community facilities' but this isn't clear. We strongly suggest for clarity that a definition for the collective term 'community facilities' is included in the Glossary and Policy IN1 'Reasoned Justification' along the lines of community facilities provide for the health, welfare, social, educational, spiritual, leisure and cultural needs of the community. We would expect there to be a robust policy specifically to protect and enhance your existing community and cultural facilities to reflect item 70 in the National Planning Policy Framework on page 17 which	A community facility does include cultural provision. The list of types of infrastructure is an indication of the types of things that it includes rather than a complete list. An extra reference to cultural facilities will be added to the vision and list of infrastructure.

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Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
		states that to deliver the social, recreational and cultural facilities and services that the community needs, planning policies and decisions should plan for the use of shared space and guard against unnecessary loss of valued facilities. Also to ensure that established facilities and services are retained and able to be developed for the benefit of the community.	
Linda Robson		<p>Comments on Maidenbower. Although there is a bus to gatwick, it is as quick to walk and we need a decent direct bus service which runs there and back at suitable times for people working shifts at gatwick and/or commenting into London.</p> <p>The lack of parking and congestion issues could be solved through providing better bus services and fares that make it easy to change bus at three bridges.</p> <p>I currently can't drive for medical reasons - I would like to get to k2 to help my recovery but it would take nearly two hours on the buses!</p> <p>There is a problem with driver speeding on the estate which is dangerous for cyclists and hence means we get cyclists in the pavement which in turn is dangerous for pedestrians. If we can enforce the speed limit it will reduce traffic and improve it for everyone.</p> <p>The new pavilion is really great and we are very lucky to have it.</p> <p>There is a big enthusiasm for cycling at the moment. Capitalise on the Olympic legacy by making Crawley more cycle safe and you will be addressing problems of traffic congestion, obesity etc and improving general well being.</p>	<p>There is an extensive network of bus services in Crawley which link the neighbourhoods with the main destinations in the town such as the town centre, Manor Royal and Gatwick. Where possible these services are direct but it must be commercially viable for the bus company to run services. Although K2 is on the number 2 service, it is not possible to provide direct services to all the neighbourhoods. The Council works with West Sussex County Council to help identify areas which are in need of traffic calming.</p>
Richard W Symonds		Any new building areas must have sufficient bus routes serving them, not every person can afford a car.	<p>The Borough Council seeks to allocate new development close to the existing bus network in the town so that users can benefit from existing services. The bus company has been involved in discussions relating to the provision or extension of bus routes to serve the new neighbourhoods in and around the town.</p>
Patricia Harman		Ifield station must be included in the upgrading of Crawley and Three Bridges. Kilnwood Vale is being built West of Bewbush, therefore it is in operation railways	<p>Ifield station is included in the policy on stations. Any improvements to Ifield would need to be undertaken by the railway companies but it is recognised that the</p>

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Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
		links-and fastway bus links- are provided west of Crawley.	station performs an important function. Kilnwood Vale will be incorporated into the bus network for Crawley and may also be provided with a rail station/.
Ian Meorow		We can't ALL have facilities on our doorsteps. Q23. There needs to be a suitable way to get to the line going South. All those stairs plus luggage is too hard.	Any improvements to the stations will be the responsibility of the rail companies although the Borough Council can provide support. Improvements to the access to the platforms has been carried out at Three Bridges Station and it is recognised that there needs to be improvements between the platforms at Crawley station/
M.J Wright		Get rid of all of the pointless bus lanes that just cause more traffic congestion. people with cars will not stop using them just because there are a few bus lanes around the town.	The bus lanes were introduced as part of the Fastway project to increase the speed and reliability of the bus services to make it more attractive to passengers. Passenger figures have already surpassed targets. The impact on the rest of the road network was considered at the time that Fastway was constructed.
Brain Champion		Q22. facilities within walking distance ie shops, community hall, school.	The neighbourhood layout of Crawley helps to facilitate the provision of such services with walking distances.
Myriam Fenton		Q23. The development of kilnwood Vale, west of Bewbush is officially Horsham, which will benefit from the Council Tax; but its proximity to Crawley will only put extra strain on local services. If a Train Station is built it must be in addition to lfield. The extra traffic will result in considerable congestion and worsen existing rat runs through Gossops Green to the Airport and Manor Royal	The provision of a rail station at Kilnwood Vale is being considered subject to a business case but this is in addition to the station at lfield.
Hajid Hussain		If you do build a new centre, please make sure that parking facilities are planned properly and not just and after thought.	Noted.
Sharon Harris		Crawley is a town near Gatwick Airport upgrading Crawley and Three Bridges stations is vital-including hospital.	Noted.
Mark Harris		Road transport accounts for about 80-90% of all journeys made- rail maybe 5-10%. I think these proportions should be kept in mind when allocating measures	The Borough Council seeks to improve access by public transport to help manage the impact of growth in the town.
Promodini		You left out lfield station. Our limits to London and the	The role of lfield Station is supported in the Local Plan

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Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
		South coast are vital. Lose these and a large proportion of the local population will stop bringing their income to the town. They will more accuracy and Crawley will die	policy.
Yvonne Jones		Crawley railway lines and three bridges station need modernisation	The rail companies have recently improved facilities inside Three Bridges Station and are working with the Borough Council to improve the forecourt area. The Borough Council will also work with the rail companies to encourage the improvement of facilities at the other stations. Services on the lines serving Crawley will benefit from planned improvements elsewhere on the Brighton Main Line.
W Jakes		Crawley station need to be done WP	Noted.
Ronald Lewis		We have seen in the local paper a plan to pedestrians the area in front of the station and to reduce the road width - how ridiculous when the road is very congested at times especially nearing Christmas	The Borough Council will work with the rail companies to improve the stations. Designs are being produced for the forecourt around Three Bridges Station. The impact on all users and the impact during construction will be considered as part of the proposals.
Petrow Turner		Public transport is a priority for high volume areas	Noted.
Jose Freifas		Growing elderly population easily established, new transport necessary	Noted.
Andrew Keeley		Just the train Crawley's should link up, their socks on service, they are quite poor.	Noted.
G Brown		Overline house is rancid	Noted.
Su Austin		Bus leaves by library, any negotiation w.bus companies for used bus leaves/stops etc should ensure practical stops eg library, old library had to fight 10years to get a stop and this has been lost in new development. surely bus company/drivers and police traffic control can manage to stop buses can	The provision of a stop close to the library for use by non Fastway buses has been considered but it is difficult to provide in a suitable location to enable buses to then turn towards the bus station.
Mrs Barbara Sbinnet		Don't forget lfield in all cases especially as a major consideration	Noted.
Sally Mill		the updating and re development of both stations, but particularly T.B is long overdue! greater emphasis is needed to incorporate increasing in fact, every increasing traffic flow! it can only be imagined what the effect will be when all these new proposed housing	The Borough Council is working with the rail companies to improve the area around the station forecourt at Three Bridges Station. Consultation on the designs will be undertaken shortly.

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Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
		areas are developed	
Rachel Comingall		ifield as usual, no facilities there what so ever	Noted.
Matthew Dyball		Infant primary schools are over-subscribed already so more classrooms eg(1school) should be considered. The hospital is only an urgent treatment centre plus some out patients. It is not adequate now, what is going to happen with 6960 more homes? A new hospital at Pease Pottage please! East Surrey Hospital can not cope now	The Borough Council works with the infrastructure providers to help ensure that they plan for additional development in Crawley. The County Council has sought to increase capacity at existing schools other than where whole new neighbourhoods are proposed which are provided with their own primary school. The health authorities are responsible for the organisation of acute medical services such as hospitals and have reviewed the provision in Crawley and are not proposing a new hospital.
Mr F Halliday		But crawley has expanded to more than fill the existing boundary and can not continue to expand in population without expanding the boundary. Horsham should not be allowed to dump its social problems on Crawley. If Crawley has to provide infrastructure for an area then this area should pay its rates to Crawley	Kilwood Vale is being provided with its own neighbourhood infrastructure and its impact on Crawley's infrastructure has also been considered.
Mrs A. Halliday		Although not directly a CBC responsibility-sewerage treatment, domestic water supply and energy supply should be guaranteed at the planning stage	The Borough Council works with the infrastructure providers to ensure that they take into account the planned levels of development in Crawley in their future plans. Sufficient capacity exists in the sewage treatment work until 2021. Discussions will continue regarding provision after this date.
Rachel Warham		Some sort of light rail/fastway link from Gatwick, via manor royal, to three bridges, and maidenbower, crawley down and east Grinstead is vital in order to reduce traffic pressures and improve access.	There are already good links between Crawley, Gatwick and Manor Royal. The future development of additional links will need to be commercially viable and the Council will continue to discuss service enhancement with the relevant organisations.
Elaine Deehan		parking at three bridges, crawley and ifield station needs to be vastly improved!!	Noted.
Phil Powell		This will encourage visitors/tourism	Noted.
Simon Darroch		Develop either Three bridges or Crawley	Noted.
Mrs Flood		Q22.Shops business units doctors surgeries community centres yes and ifield. I also have a plan for the railyard on the industrial estate to secure the whole of Crawley better	Noted.

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Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
Mrs Margaret Rixon		Train stations especially important to me	Noted.
Mr C W Lusby		Crawley station is not enhanced by the ugly building it is housed in, being the first point of call it does not give favourable impression to visitors	Noted.
Mrs Lewin		The idea of a new station for Horsham's Bewbush West is an excellent one. It would be good if trains stopping at three bridges and crawley also stopped at Ifield which is just as much part of the town and has mainly season ticket holding travellers	A business case for the provision of a station at Kilnwood vale is being considered by the rail companies. Trains would continue to stop at Ifield.
Kevin Usbcrn		It is important that new schools and doctor surgeries are built with new developments-Pembroke park is an example how NOT to do it-no new school and no doctors!!	The Borough Council works with the infrastructure providers to ensure that they take into account the needs of new development. It is not possible to provide facilities on site as part of all new development due to the way in which services are provided.
Carrie Boslley		the failure of crawley in the past arises from the original town plan with target population of 60000 it is now double that with no sign of the planning of the towns facilities to cope with	Noted. The Borough Council works with the infrastructure providers to ensure that they take into account the needs of new development.
Peter Nash		Aren't these obvious? development of both stations must include adequate for affordable car parking	Noted. Stations need to be accessible by all forms of transport and parking provision is part of this overall strategy.
Dianne Kingshott		Three bridges station: 1) car park must be extended and charges reduced in order to reduce commuters parking in nearby street. 2) drop off off/pick up area must be increased and access improved. often main road is blocked by cars trying to get into the station. 3) taxi's must be given somewhere else to wait. also they should be banned from waiting in the short term parking area which is meant for drop off/pick up	The Borough Council is working with the rail companies to improve the forecourt area. There are physical restrictions on how to increase the amount of parking although the rail companies are considering the way forward.
Ronald Cooler		I am on the 6year waiting list for three bridges station-ridiculous! if crawley wants to keep people here bringing in high income parking must be sorted and soon!!!	The Borough Council is working with the rail companies to improve the forecourt area. There are physical restrictions on how to increase the amount of parking although the rail companies are considering the way forward.
P Cooper		The council needs to tackle the issue of accessing the train stations. good train services are no good if people cant get to them easily or park at the station	The Borough Council works with the transport providers to help ensure that the stations are accessible by a variety of forms of transport.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
Mrs P Spall		Tragic long term wasted opportunities to not develop the success of fastway by P+R from junction 10(M23) to TB station of town centres provision of large capacity multi-storey parking at TB station linked with development of new carriage sheds	There are various conditions that need to be in place for a park and ride scheme to be commercially viable. The Borough Council is working with the rail companies to improve the forecourt area. There are physical restrictions on how to increase the amount of parking although the rail companies are considering the way forward.
Mrs Jean Calcott		There should be a line made that feeds directly into the London to Brighton. I feel that there should be a direct line from Crawley to Brighton	The rail companies are seeking to increase the capacity of the Brighton Main Line by planned signalling improvements elsewhere. There are not any proposals for new lines.
Jacqui Robinson		The town centre train station is a great structure, it would be great to see it returned to its former glory	Noted.
Robert Pride		Rail links are essential to the town	Noted. Planned signal improvements elsewhere on the Brighton Main Line should help improve services to Crawley.
Rob Pullinger		just because people live near certain amenities doesn't mean they will walk to them or even drive to the same type of service on the other side of town. Few people change their dentist or doctor when they move within the town. so I think its irrelevant	Noted.
Chantel Wetton		Home owners should be given incentives to install driveways. This would clear blocked roads and allow buses and traffic to flow better. When I lived in Burgess Hill and an estate was built at the end of my road the council agreed permission if the builder installed free driveways for existing dwellings-it was not compulsory but made a big difference-a common sense solution	The Borough Council does have a programme to address existing parking issues in the town although this budget is limited.
Colin Maughan		A large town like Crawley needs to attract workers and shoppers from outside the town. Many, probably most will travel by car so more imaginative measures like Horsham Councils, which allows up to two hours free parking (using cardboard clocks inside car owners windscreens) would encourage more people in the town and perhaps release some all day parking space. A larger more efficient bus station is urgently required. I have sent Metrobus an improved layout for the existing site. If I was Metrobus I would see if I could buy better	Noted. The Submission Local Plan sets a positive strategy for the plan period to 2030. This includes policies to promote a diverse economic environment, improved transportation means, and an improved Town Centre. The council regularly liaises with Metrobus to ensure that there is a good bus service within the borough at a corporate level however there are policies within the plan to support infrastructure development. Other issues raised are outside the scope of the Local

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 6: Infrastructure	CBC Officer Response
		<p>buses. Key staff in CBC needs to go to visit forward thinking towns in Holland and Germany. Some are more imaginative and better designed. The aim should be to make our town a pleasure to visit. I can provide a list of towns and cities in Europe to visit if necessary. The Town Twinning scheme should be able to help with this. Crawley is becoming mediocre suburban area and the life seems to have been sucked out of it. This is partly due to growing too rapidly and decaying in the centre. Also to rely on companies like Land Securities to shape the environment. They are only interested in their profits and far from altruistic or forward thinking. Facilities and services are a difficult balance to maintain as retailers in the neighbourhoods and the town centre both need an adequate number of customers. The local shops tend to charge more, probably due to paying high rents from small shops. The range of shops in the town centre has deteriorated to such a degree partly due to so many supermarkets that I now need to go elsewhere. When I first came to Furnace Green some shop keepers had small shops here and larger ones in the centre. This might have been a good pattern.</p>	Plan.

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
Dr Bill Temple-Pediani	KTI Energy Limited	We strongly support a second runway subject to the creation by Crawley Borough Council and Horsham District Council of a significant number of new jobs within Gatwick Diamond	Noted.
Dr Bill Temple-Pediani	KTI Energy Limited	For much of southern England, Gatwick Airport is a sustainable hub airport compared with Heathrow Airport. We would like to see Heathrow closed in favour of a second haum in the Thames Estuary.	Noted.
Dr Bill Temple-Pediani	KTI Energy Limited	KTI Energy Limited has made coherent representation to West Sussex County Council, Crawley Borough Council and Horsham District Council for the proposed renewable CHP scheme to be simultaneously entered into the Waste Plan and Local Plans. The Planning Inspectorate is insisting they all comply with Section	Noted.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
		110 of the Localism Act 2011.	
David Knevet	None	I strongly agree with keeping Gatwick as a single runway airport - although a 3rd terminal might be an acceptable option for any expansion. Building a 2nd runway to the south of the main runway, with the approx 1 Km separation between the that and the existing runway will bring the new runway very close to built-up areas in Langley Green and Ifield. The indication in the current Gatwick planning document that a second runway would require the diversion of sections of the A23 and related access to northern and north west Crawley will certainly impact upon the residents of that area in terms of additional noise and changed traffic patterns. Plus, aviation noise and aircraft fuel pollution is already noticeable in Ifield and a 2nd runway would only increase this.	Noted.
Tony O'Connor	Moat Homes Ltd	The second runway in the Gatwick Master Plan 2012 is a 'wide-spaced' runway at least 1.5 kilometres south of the current runway. The land currently being safeguarded by CBC, as we understand it, is for an additional 'closed spaced' runway. A wide spaced runway would come very close to Ifield Avenue and the flight path would cross ifield Avenue at the end of Ifield Green. This would seriously damage the quality of Ifield Village Conservation Area. GAT2 does not seem to address this possibility. We are only 7 years away from the time when legally building of a second runway could be permitted. (See Gatwick Master Plan, Appendices: A13 and A14)	The land safeguard is for a wide space runway based on a distance of approx 1035 metres between the runways which is in line with the latest options submitted by GAL to the Airports Commission. The Local Plan can only reflect the latest information but will also acknowledge that the plan will need to be reviewed when there is greater clarity about a second runway at Gatwick.
Richard W Symonds		We do not need or require a 2nd runway, we already listen to aircraft landing/take off in early hours of day/night particularly in the summer. So much would be destroyed if a 2nd runway was to go ahead, e.g.. wildlife, as previously advised. More traffic congestion, more housing etc. it is not needed. The disruption to the area would be unbearable. Definitely NOT needed.	Noted. The council is assessing the impact of noise on the borough.
Patricia Harman		After 2019, a second runway should be built. it will be good for the area-especially economically. there is a listed church building located on the proposed new	Noted.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
		runway. this will need to be demolished, but it is critical parts of the Church should be preserved, such as the magnificent rose windows (I little dog) designed and sculptured by William Burgess	
Ian Meorow		the boundary is needed for airport development and services. There is a 2nd runway there-used as Taxiway. it was built of sufficient strength to the used as a runway-at the time.	Noted.
M.J Wright		A larger airport means more jobs for the local community.	Noted.
Gary Peters		The space is their for a 2nd runway lets USE IT	Noted.
Gail Erickson		If a aeroplane crashes on the lane all the flights get cancelled	Noted.
Sharon Harris		If its for the advantage of the town	Noted.
D Binderman		Two runways would improve the employment situation and bring more business in to West Sussex. Surrey	Noted.
Mark Harris		No new runway at Gatwick please	Noted.
Promodini		The designs for a second runway on the 'Northside' have existed since I was a small child. to remove the potential there in contained would be stupid and short sighted. Crawley has been fortunate over the years to have such a large employer in the area and the restaurant revenue income. It would be foolish to lose it.	Noted.
Yvonne Jones		Gatwick definitely needs second runway, do not stop the growth of the economy, it is very vital	Noted.
W Jakes		I do not want another runway at Gatwick Airport	Noted.
Ronald Lewis		Car parking is already set up at the 'overline house' car park for the airport. some residential roads are also used for holiday parking. it should be kept to the airport only	Noted.
Petrow Turner		A second runway for Gatwick would guarantee the future prosperity of the area and should be fully supported. As part of the growth, park and ride to Gatwick should be an option to consider	Noted.
Rajinder Sorrot		I strongly disagree with only one runway in Gatwick. I	Noted.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
		think that 2 runways give Crawley more job opportunities and more money for town to develop	
Jose Freifas		Important for employment and growth to have a second runway	Noted.
Andrew Keeley		The more runways the more employment	Noted.
Arshad Khan		A 2nd runway with a fast link to Heathrow and the existing access to London will benefit the local economy supporting the expanding population of Crawley and the surrounding areas	Noted.
J Ramsay		I would not be against a 2nd runway in principle, expanding the airport could be useful economically	Noted.
Mrs Barbara Sbinnet		The development of Gatwick must go ahead as soon as possible (before 2019) reason- Crawley will die if it is not pursued	Noted.
Manzaar Ahmad		The airport should be 'contained' and not encroach any further outlying villages or country side. Noise is also an issue as too is pollution, especially from aircraft fuel fumes. One runway is enough, if more capacity is needed, perhaps 'Boris Island' should be considered	Noted.
Matthew Dyball		parking outside the airport creates and is already creating many road movements from car parks to hotels to the airport. When the congestion builds up, Copthorne is used as a 'cut through' this is a village with a 30mph restriction and part T.2.0	Noted.
Mr F Halliday		Gatwick is ideally situated to serve the SE but it is too remote to serve the rest of the UK, London needs a hub airport but airlines do not think Gatwick is the right location and move to Heathrow whenever slots there are available. The proposed wide spaced runway is also too close to residential areas in Crawley-especially the new NE sector	Noted.
Rachel Warham		I do not have a problem with 2 runways at Gatwick, it will help the airport maintain its prime airport status. The 2nd runway should use as much existing infrastructure as is reasonably possible before more land is used	Noted.
Elaine Deehan		If all the extra housing is proposed, Gatwick airport needs to expand to 2 runways, otherwise you need to	Noted.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
		explain what additional working places are going to be generated	
Phil Powell		I have previously campaigned against another runway and have not changed opinion	Noted.
Mrs Flood		One runway three terminals. I have an extensive aviation plan for the whole country that includes Gatwick, but a new runway I am totally against and so should the council be. It uses land that we will need for industrial estate expansion. I have an alternative for Gatwick that sees expansion but also sharing. I lobby for the country not one organisation or authority.	Noted.
Fiza Khan		Q26. With only 1 runway congestion is a major safety factor. We have as many as 2or 3 over flights over Gossops Green in the summer months A DAY due to overcrowding of the landing aircraft on departing aircraft	Noted.
Mrs Margaret Luetchford		Gatwick needs 2runways too enable it too be more efficient and bring more jobs to the area	Noted.
Mrs Lewin		Cars dominate (and spoil) crawley, a second runway would mean that even the air was spoilt and noise would affect even more of the towns population that at present	Noted. Policies in the local plan seek to encourage the use of public transport. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process.
Kevin Usbrm		Q26 A second runway will create much needed employment for the crawley residents	Noted.
Mr Alred Tidey		there are lots of people like to fly from Gatwick (around the country) two runways will help make it more easier for people who come here and will be good for Crawley's economic as well	Noted.
Mr P Robinson		if ever a 2nd runway were built the environment damage from noise and pollution would be realised and the quality of life for people in Langley Green and Ifield would be impaired	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process
Neil Dobson		We need a 2nd runway at Gatwick	Noted.
Peter Nash		I suspect that increased airport capacity is going to be required at both Heathrow and Gatwick even if the options are considered potential so it would be better to admit that sooner than later to maximise the benefits and minimise the risks. it is unlikely that adequate	Noted.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
		parking areas be provided with the airport and there in nothing 'green' about everyone driving to the airport. better to provide 'park and ride' facilities away from the airport (with effective buses?)	
Dianne Kingshott		<p>Gatwick should not be extended because it is South of London. most of the extra passengers will come from N round to W of London. therefore somehow they would have to get through on round London. if Gatwick is developed: 1) M23 would have to become 4lane and m25 5 lane</p> <p>2)rail systems would need another line up to London</p> <p>3) price of Gatwick express must be reduced because at present many fliers with large cases try to get on commuter trains</p> <p>4) development will generate more jobs but where will the extra workers live. Unless crawley boundary is extended, there is no where for crawley to build extra houses</p>	Noted.
Denise Beer		Gatwick should het a 2nd runway and terminal, this would bring more jobs to the area	Noted.
David Leonard Newble		We need two runways for economic growth	Noted.
Tammy Lai		A second runway would increase employment in the area and bring more money into the town/area	Noted.
Sally Cowell		Bigger airport will provide more jobs etc...	Noted.
Robert Monteath-Wilson		Gatwick airport needs 2nd runway to expand and encourage long haul and major airlines back to Gatwick	Noted.
Richard Bateman		NO Gatwick expansion, fuel will be too scarce and expensive anyway in next 20-30yrs	Noted.
P Cooper		Space should be used efficiently and therefore unused business areas could lend themselves to off sit parking but must be controlled and provided to a good standard	Noted.
Rebecca Halpern		Crawley is noisy enough with its M23 and mainline railway	Noted.

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
Dave Mathaway		Air transport is only going to increase in popularity and Gatwick will need to expand to keep up with demand	Noted.
Mike Moss		My home is behind the rugby club in Langley Green. we already have high air traffic	Noted.
Mrs Jean Calcott		if the 2nd runway goes where it would appear it will go it will come very close to the housing at Langley Green and pound Hill North	Noted.
Shaista Gulza		Have not enough knowledge to decide whether it would put Gatwick at a disadvantage in future to restrict it to the one runway, although other factors must be taken into consideration such as the input in surrounding areas with pollution, noise and extra facilities requested to service in the airport if enlarged, with staffing, travel to and from London and coast and infrastructure needed to make it matter extra housing required for people wishing to have and work in the area	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process
James Conboy		Two runways would be better in the long run	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process
Jacqui Robinson		Gatwick must be allowed to expand to meet the demand of its business. This expansion could offer great opportunities for people who live in Crawley	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process
S Graves		Need new runway, airport parking must and limit	
Robert Pride		Gatwick needs another runway, without it the airport will become a second rate airport and the town will suffer as a result	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process
Rob Pullinger		there seems to be more planes flying over the town centre now. This will only increase with a second runway and make Crawley a horrible place to live	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process
Chantel Wetton		Gatwick is full, but to increase flights and probably fly all night would have too great a negative impact on the quality of life of residents. More employees will be required who will need more housing-a vicious circle	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process
Colin Maughan		I do not know anyone and neither have I met anyone whom likes going to Gatwick Airport to catch a plane or meet an incoming passenger; likes working at Gatwick	Noted. The Council will continue to engage in the debate about the second runway as part of the Airports Commission process

PART 2: REPRESENTATIONS RECEIVED VIA QUESTIONNAIRE & OFFICER RESPONSES

Name	Organisation	Topic 7: Gatwick Airport	CBC Officer Response
		<p>Airport. It has an image problem and there terrorists if any have won. It has become a nightmare, security dominated, greedy place and unless this atmosphere can improve we shall travel by air from Southampton or more likely continue to go by train or ferry.</p> <p>Unfortunately train fares are so expensive now that travel by car or air is cheaper as well as more convenient for any journey that can be done in a day. If the journey by road includes movement with the M25 this too will be a nightmare.</p>	

PART 3

Direct Representations & Officer Responses

The Council can only consider comments by respondents who provide their names and contact addresses. In line with the Council's Public Sector Equality Duty, the Council will not accept representations, objections or comments that are deemed to be inappropriate, offence or racist. In general terms, a racist representation is one which includes words, phrases or comments which are likely:

- to be offensive to a particular racial or ethnic group;
- to be racially abusive, insulting or threatening;
- to apply pressure to discriminate on racial grounds;
- to stir up racial hatred or contempt.

Any objections and comments that have been deemed to be inappropriate, offensive or racist have been removed.

General Feedback					
Names	Surname	Organisation	On behalf of	Comments	CBC Response
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>	Comments noted - the Local Plan will require protection of Crawley's most valued green infrastructure and seek new and/or enhance GI to support development.
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>	Noted. The transport assessment work recognises that the network in Crawley does not operate in isolation from the surrounding areas and considers potential impacts over a wider area.
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>	Comment noted, and continuing joint working is welcomed, particularly to consider the strategic and cross-boundary implications of the respective Local and Neighbourhood Plans over the wider Housing Market and economic functional area(s). Particularly in commissioning joint evidence base and securing

General Feedback					
Names	Surname	Organisation	On behalf of	Comments	CBC Response
					<p>agreed sustainable development outcomes.</p> <p>Meetings individually between the two authorities; as part of the tri-authority northern West Sussex, along with Horsham District Council; at both Gatwick Diamond and West Sussex levels; and any wider groupings considered necessary as issues emerge are actively sought and participated in by officers and members of Crawley Borough Council.</p>
Colin	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>	<p>The Local Plan seeks to protect valued open space, improve and create new open space where there is deficit and consider areas that have surplus open space for other forms of development. This is alongside other local plan policies to ensure the distinct New Town character of Crawley is maintained.</p> <p>Protection of open space will be through:</p> <p>Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance.</p> <p>Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013)</p>

General Feedback					
Names	Surname	Organisation	On behalf of	Comments	CBC Response
					<p>ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.</p> <p>All responses to this question have been noted and assessed whether it meets NPPF criteria para 77 or whether the Local Plan draft policies on open space and character (such as CH3, ENV1 and ENV4) provide the appropriate level of protection.</p>
David	Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	<p>The Local Plan is clearly defective as it provides insufficient land for housing. There is also a real risk that policies of the plan will impose unreasonable burdens on the housing land that is available which may also frustrate the delivery of those sites which would worsen the situation further contrary to national guidance.</p> <p>Both of these issues need to be resolved before the Council can proceed to a Submission Draft Local Plan.</p>	<p>Comment noted. A viability assessment has been undertaken to ensure that the majority of new development will not be hindered by policy requirements. This will be available on our website when the Local Plan is submitted.</p>
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. 4. The lack of any distinction between policies which CBC might implement directly, those where CBC might provide enabling infrastructure, and those where CBC might provide encouragement, for example by providing funding to others. <p>To illustrate point 1, let us take a section from page 20:</p> <p>“As a new town with a large stock of modern and generally well</p>	<p>The council has aimed to produce an accessible document that is easy for all to understand and use. That said the Local Plan is a technical development plan that is responsible for the borough’s development over the Plan period, as such an element of technical wording is required.</p> <p>The Submission Local Plan is a more concise and less wordy iteration reflecting your comments.</p> <p>The council is also investigating ways of making the plan more accessible through the utilisation of</p>

General Feedback					
Names	Surname	Organisation	On behalf of	Comments	CBC Response
				<p>maintained housing, precedence for maintaining this standard has been set. All new housing and its surroundings should be suitable in terms of size, design and facilities for the requirements of its occupants and should not give rise to environmental and amenity problems.”</p> <p>These 55 words are “Motherhood and Apple Pie”, in other words support for a principle that nobody would disagree with, which says nothing that moves the discussion on to any sort of conclusion.</p> <p>An example of point 2 is “cultural offer”. This leaves me baffled; who is offering what to whom? The only justification for jargon is that when used between specialists it should convey precise meaning. It should not be used in communication with non-specialists. I suspect that this particular bit of jargon fails to convey precise meaning even to specialists.</p> <p>On point 3, there appears to be a hierarchical relationship between vision, strategic policies, other policies etc., but the reader is left to follow multiple references in the document to discover the relationship between these. A simple tree diagram would give an overview of these relationships and aid navigation through a complex document. Draw a map of which sections of the vision are addressed by which strategic policies, and how these are implemented by lower-level policies.</p> <p>On point 4, and returning to “cultural offer” for an example, it would be helpful to clarify who the CBC thinks would provide cultural input, what those cultural inputs might be, and what CNC thinks it could do to provide, enable or encourage those inputs. I can imagine that provision of The Hawth might be one of the ways of providing “cultural offer” but beyond that, imagination fails. The draft needs to be more specific.</p> <p>In future, to aid a meaningful consultation, it would be worthwhile to invest effort to make the draft much smaller. At an estimate, it could be shrunk by 50% without much difficulty by removing unnecessary statements and making those that remain more concise.</p> <p>In my opinion, the draft is not an adequate starting point for consultation because it is extremely difficult to extract any meaning from the dense thicket of words. Why not consult the</p>	interactive mapping.

General Feedback					
Names	Surname	Organisation	On behalf of	Comments	CBC Response
				Campaign for Plain English who would be delighted to advise you?	
Valerijus	Vilcinskas	Eastern Stream Association		I am chairman of Eastern Stream Association in Crawley. I would like to have included in the forward planning documents that we wish to open an Eastern European Culture Centre.	Noted. This would not require an allocation in the Local Plan.
Sally	Stallan	Horsham District Council		We look forward to being involved in subsequent stages of the Development Framework process and welcome the opportunity to work alongside Crawley Borough Council to seek acceptable outcomes on any identified cross boundary issues.	Comment noted, and continuing joint working is welcomed, particularly to consider the strategic and cross-boundary implications of the respective Local Plans over the wider Housing Market and economic functional area(s). Particularly in commissioning joint evidence base and securing agreed sustainable development outcomes. Meetings individually between the two authorities; as part of the tri-authority northern West Sussex, along with Mid Sussex District Council; at both Gatwick Diamond and West Sussex levels; and any wider groupings considered necessary as issues emerge are actively sought and participated in by officers and members of Crawley Borough Council.
Robin	Shepherd	Barton Willmore	Mayfield Market Towns Ltd	SEE FULL REP - Failure to Demonstrate the Duty to Cooperate Crawley Borough Council has not demonstrated the Duty to Cooperate with its neighbours, Horsham and Mid Sussex. There needs to be a clear statement of the steps taken to demonstrate this duty and the plan needs to reflect the specific housing allocations outside the Crawley boundary which are to meet Crawley's housing needs that cannot be met within its boundary. The Crawley Local Plan should specifically make reference to the New Market Town as a medium to long term housing solution.	The Duty to Co-operate is an ongoing process of dialogue principally between the authorities within the North West Sussex Housing Market Area. The Local Plan recognises that much of Crawley's unmet housing need will inevitably be accommodated across the wider Housing Market Area within West Sussex and Surrey. The Council has adopted

General Feedback					
Names	Surname	Organisation	On behalf of	Comments	CBC Response
				<p>The Duty to Cooperate is a legal requirement and is significantly more than a responsibility to discuss relevant matters with adjoining local planning authorities. Whilst forums in which to discuss matters are clearly in place, no meaningful information is set out in the Preferred Executive Summary 20582/A5/RS/DB/jp/djg 03 December 2012 Strategy Consultation Draft Local Plan as to how the significant housing needs of Crawley that cannot be met within its boundaries are to be provided. This is vital in Crawley's case as there is a clear inability for it to meet its full housing needs within its boundaries.</p> <p>Given the above, a way forward that would positively respond to the Duty to Co operate requirement, would be for the three local planning authorities (Crawley Borough Council, Mid Sussex District Council and Horsham District Council) to jointly commission work to identify objectively assessed sub regional housing needs and test the options for meeting those needs. It is considered that a New Market Town, between Sayers Common and Henfield on the A23, is integral in meeting sub regional housing needs.</p>	<p>the Gatwick Diamond Local Strategic Statement and associated Memorandum of Understanding which sets out the Council's position on strategic planning matters (including housing) across the Gatwick Diamond and identifies that new housing will be required to support the Gatwick Diamond economy. The Council is currently working on the preparation of a Position Statement on the Duty to Co-operate Requirement across the North West Sussex authorities and this will identify how the three authorities have actively engaged in meeting housing needs and how this engagement has influenced the plan making process.</p>
Robin	Shepherd	Barton Willmore	Mayfield Market Towns Ltd	<p>SEE FULL REP - Failure to Demonstrate Soundness of the Plan</p> <p>These representations consider that the Preferred Strategy Consultation Draft Local Plan is unsound. The Preferred Strategy Consultation Draft Local Plan is not based on a strategy that seeks to meet objectively assessed housing need and is not considered to meet any of the four tests of soundness set out in paragraph 182 of the NPPF.</p> <p>The Preferred Strategy Consultation Draft Local Plan fails the 'Positively prepared' soundness test as it does not meet Crawley's objectively assessed housing need. It fails the 'Justified' soundness test as the Local Plan evidence base does not consider how Crawley's full housing needs can be met. It fails the 'Effective' soundness test as it is not based on effective joint working on cross boundary strategic priorities, specifically housing. It fails the 'Consistent with national policy' soundness</p>	<p>The Local Plan seeks to maximise the capacity of the Borough to accommodate objectively assessed need. In doing so, it is considered to be sound, in that it is positively prepared, justified, effective and consistent with national policy. The plan recognises that much of Crawley's unmet housing need will inevitably be accommodated across the wider Housing Market Area within West Sussex and Surrey. The Council has adopted the Gatwick Diamond Local Strategic Statement and associated Memorandum of Understanding</p>

General Feedback					
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				<p>test as it does not meet the other soundness tests, meet the Duty to Cooperate requirement or meet Crawley's objectively assessed housing need.</p> <p>A New Market Town would require positive, close and ongoing working between Crawley Borough Council, Horsham District Council and Mid Sussex District Council following on from the initial joint commissioning of the GL Hearn New Market Town Study . Effective joint working would positively respond to the Duty to Cooperate introduced by the Localism Act. Mayfield Market Towns Ltd will continue to promote the concept of a New Market Town through all future stages of the Crawley, Mid Sussex and Horsham Local Plans and ultimately at the Examination-in-Public of all three Local Plans.</p>	<p>which sets out the Council's position on strategic planning matters (including housing) across the Gatwick Diamond and identifies that new housing will be required to support the Gatwick Diamond economy. The Council is currently working on the preparation of a Position Statement on the Duty to Co-operate Requirement across the North West Sussex authorities and this will identify how the three authorities have actively engaged in meeting housing needs and how this engagement has influenced the plan making process.</p>
Mark	Bewsey	Savills	Homes and Communities Agency	<p>SEE FULL REP (THIS IS CONCLUSION)</p> <p>The HCA, as a significant landowner within Crawley borough, welcomes CBC's vision of Crawley as the premier town between London and the South Coast, and for the sustainable growth of the town. The HCA does however have concerns over the scale of development proposed which does not address the identified need for housing established through the LDF evidence base.</p> <p>The emerging Local Plan should be informed by the available evidence base which includes a Locally Based Housing Needs Assessment (2011) which identifies a requirement of 300-600 new homes per year. The Council should plan to achieve the upper end of the range (500-600 new homes per year) as the lower range would only meet housing growth linked to economic growth. The Housing Needs evidence base should take precedent over delivering housing merely to support projected economic growth, in accordance with NPPF paragraph 158. An allocation below this range will fail to meet an identified need and may mean that local people in need of a house will be displaced by wealthier in-migrants.</p>	<p>The Local Plan seeks to maximise the capacity of the Borough to accommodate objectively assessed need to increase the plan's housing requirement (Policy H1). In order to increase the ability of the Borough to accommodate additional housing, the Council will investigate the capacity of the Land East of Tinsley Lane and Kilnmead to accommodate housing and identify these as key housing sites if appropriate.</p>

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				<p>Draft policy H1 sets a requirement to deliver 3,543 dwellings over the plan period, equating to an annual average of 236 dwellings. This means that the Local Plan does not “plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community”. Overall this approach is contrary to NPPF paragraphs 7, 50, 159 and 160.</p> <p>In order to address the lack of housing supply, CBC should actively seek to identify additional available, appropriate and deliverable sites. The Land East of Tinsley Lane and the Kilnmead site are both available and entirely suitable for residential development. Accordingly policy H2 should be amended to include residential allocations for these sites.</p> <p>The HCA welcomes Crawley Borough Council's aspiration to deliver a major mixed use redevelopment in the Town Centre North area. Given the status of Crawley as a Regional Hub, the HCA urges Crawley Borough Council to promote high density development within the Town Centre North area in order to make the most efficient and effective use of land. The HCA also suggests that policy EC4 should be amended to promote residential use of under-used peripheral town centre sites in order to further improve the vitality and viability of the town centre.</p> <p>The HCA recognises that the borough is compact in nature and has limited land availability. In addition the Gatwick Safeguarding Area presents a significant constraint and this should be recognised within the Local Plan.</p> <p>Overall, in order to ensure that the Local Plan is sound, CBC should ensure that it is positively prepared, justified and in accordance with the NPPF. CBC can go some way to addressing this through allocating the Land East of Tinsley Lane and the Kilnmead site for residential development.</p>	
Elizabeth	Burt	Savills	Crest	CSP would be pleased to discuss any of the comments within	Comment noted

General Feedback					
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			Strategic Projects	<p>this representation and the site being promoted and is keen to be involved in future stages of the production of the Local Plan. CSP strongly recommends the Council re-assesses its evidence base and proposes a housing figure based on this. It also recommends that the Council undertakes discussions and joint working under the duty to co-operate required with HDC and the interested parties on the potential for the site adjacent to west of Bewbush to deliver some of CBC's housing requirements to meet the objectively assessed need for this. It is confirmed this site is available for development and would form a logical site for development.</p>	
Michael	Simknins	Michael Simkins LLP	Private Landowner	<p>SEE FULL REP (THIS IS CONCLUSION...) -</p> <p>Having reviewed the Local Plan Consultation Draft, it is evident that the Borough Council needs to refine its Table 1 of the Housing Chapter and establish its objectively assessed housing needs. As per the example of Suffolk Coastal, an Inspector at Examination will require the Council to set this out and if it cannot meet that requirement explain why.</p> <p>In light of this imbalance, land that is available, suitable and deliverable for housing is at a premium within the Borough. As per this representation, there exists an opportunity to identify an additional 'Key Housing Site' within Policy H2 to aid with meeting the Council's future housing needs.</p> <p>The land benefits from the same Policy status as that now consented within the North East Sector (1,900 units) and that recently identified as a Key Site (residual land – 100 units). With such Policy support and following a grant of consent, given its scale the land could also come forward quickly to aid the Borough Council with its 5 year land supply requirements.</p> <p>We trust that this representation is duly made and helpful to the Borough Council in preparing its emerging Local Plan. We would be happy to discuss this representation with you in person and work with the Borough Council on behalf of the landowner in delivering this opportunity towards future housing delivery.</p>	<p>Comments noted. In order to increase the ability of the Borough to accommodate objectively assessed housing need, the Council will investigate the capacity of any residual land at the North East Sector to accommodate housing and identify this as a key housing site if appropriate.</p>

General Feedback					
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S	Doherty	Civil Aviation Authority		The Civil Aviation Authority are no longer a necessary consultee.	Noted.
Lionel Eric	Crawford			SEE FULL REP... The Circular City (due to the length of this rep it has not been cited in full here. To view this rep please email forward.plans@crawley.gov.uk)	Innovative proposals noted, however outside the scope of the Local Plan.
Colin	Maughan			<p>Thank you for sending me notice of the second stage document. It is an impressive piece of work and does indeed incorporate many of the comments made by the public during the consultation period.</p> <p>I may come back to the document itself but I have two grave reservations based on my own observations of Crawley BC's approach to managing projects.</p> <p>Firstly, I see two extreme approaches:</p> <p>a) Penny pinching in the case of purchasing trees – for replacing old and perhaps dangerous trees, poor quality young trees are bought from a nursery in Wales, which often die due to neglect or vandalism. Full size trees are often replaced by scrub sized trees, undermining the garden city concept because scrubs are easier to manage.</p> <p>b) Conspicuous waste, as in the case of the Marshall's stainless steel outdoor seating recently installed in the town centre and the neighbourhoods. The existing wooden benches needed re-vernishing, 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</p>	<p>a)The Plan includes policies CH3 and CH6 relating to the retention and replacement of trees as part of development proposals.</p> <p>Former Embassy cinema - The Plan enables the pros and cons of development proposals to be carefully considered. In the case of the former cinema, the building had been significantly altered, the design of the scheme was tailored to reflect the period of the cinema and the Sussex House scheme will bring a number benefits to the town. Only ten residents submitted any comments on the planning application and not all of these concerned the loss of the former cinema.</p>

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				<p>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 Benchamn 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</p>	

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				better than public, and free markets are the future. My generation often found that there were no good products, including street furniture, available; some persuaded the manufacturers to make what we wanted. Unfortunately, this was more successful if it was made in Germany, but that is another story. I can assure you that there are some very good firms here. I 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	Noted	

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
Tim	Hoskinson	Savills	Wilky Group	Local Plan Objectives	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.	Noted. The Economic Growth Assessment (2013) identifies a qualitative and quantitative need for additional business floorspace at Crawley. To help meet this need, the council is seeking to direct business to the existing main employment areas. It is recognised that there may be need for strategic employment land at Crawley during the course of the plan period, though certainty as to the future of status of Gatwick safeguarding will be needed before options can be explored in full. This position is therefore reflected in the approach of submission local plan policy EC1.
John	Lister	Natural England	0	p.22	Natural England support the issues set out in paragraph J Green Infrastructure; within which the aims of the Council in protecting Green Infrastructure are detailed. Natural England	Comment noted - priorities 7 and 8 does relate to the natural environment/public open spaces where informal leisure activities

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					agree with the justification text as follows; 'Green Infrastructure can improve the quality of Life of residents and therefore requires protection from ill considered development'.	take place
John	Lister	Natural England	0	p.27	<p>Natural England offer support to the following objectives;</p> <ul style="list-style-type: none"> • Objective 10: To ensure the protection and enhancement of valued open space; • Objective 13: To ensure the provision of sufficient infrastructure to meet the requirements of the borough; • Objective 15: To promote healthy, active, cohesive and socially sustainable communities; • Objective 16: To work towards ensuring Crawley is a carbon neutral town by 2050; • Objective 19: To reduce car journeys and promote sustainable and alternative methods of transport, whilst ensuring sufficient transport infrastructure is delivered to meet the requirements of the Borough; • Objective 20: To conserve and enhance the biodiversity habitats, key landscape features, fauna and flora within the borough, and; • Objective 21: To adapt to the effects of climate change through the reduction of the risk of flooding and the amount of waste water, sustainable design of developments and effective management of water resources. <p>Natural England consider that each of these objectives carry through the aim of ensuring sustainable development runs through the decision making process. These objectives also show a clear aim to ensure the protection and enhancement of the natural environment.</p>	Support noted
Tim	Hoskinson	Savills	Wilky Group	Policy Context	NPPF - As set out in our comments on the approach to economic growth and employment, there is a need for strategic employment	Noted. The Economic Growth Assessment (2013) identifies a qualitative and quantitative need

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					development to meet wider sub-regional needs as identified in the Gatwick Diamond Futures Plan and in the Gatwick Diamond Local Strategic Statement and supported by the Local Economic Partnership (Coast to Capital). The evidence base submitted in support of the Gatwick Green proposals demonstrates the sustainability credentials of the location and the proposed development. Under the NPPF, the emerging Local Plan has an obligation to address this opportunity positively and unlock barriers to investment.	for additional business floorspace at Crawley. To help meet this need, the council is seeking to direct business to the existing main employment areas. It is recognised that there may be need for strategic employment land at Crawley during the course of the plan period, though certainty as to the future of status of Gatwick safeguarding will be needed before options can be explored in full. This position is therefore reflected in the approach of submission local plan policy EC1.
Tim	Hoskinson	Savills	Wilky Group	Policy Context	The measures set out this section of the plan for addressing the Duty to Co-operate are supported, in particular the Gatwick Diamond initiative as a means of addressing cross boundary and strategic planning issues. The evidence base previously submitted in support of the Gatwick Green proposals includes a review of the regional policy context and concludes that Gatwick Green would achieve a high degree of consistency with regional and sub-regional policy by providing for strategic development at sustainable locations to cater for the wider sub-regional needs of the area as identified in the Gatwick Diamond Futures Plan and in the Gatwick Diamond Local Strategic Statement and supported by the Local Economic Partnership (Coast to Capital).	Noted. As above.
Tim	Hoskinson	Savills	Wilky Group	Policy Context	SE Plan & DUTY TO COOPERATE - The plan identifies a number of specific issues for Crawley arising from the Gatwick Diamond Local Strategic Statement (LSS). This includes the recognition that given the strength of Crawley/Gatwick as a business location and the	Noted. The Economic Growth Assessment (2013) identifies a qualitative and quantitative need for additional business floorspace at Crawley. To help meet this need, the council is seeking to

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					<p>concentration of demand there, it will be the main focus for future economic development. In relation to business development opportunities, the plan identifies the potential for opportunities within built up areas and extensions to existing employment areas. It also notes that there is potential to regenerate existing employment areas to create business environments attractive to a range of knowledge based companies, although stronger demand comes from warehousing and distribution.</p> <p>However, this section of the plan fundamentally fails to reflect the findings of the Gatwick LSS that the Gatwick Diamond lacks the modern, flagship science or technology parks which are particularly attractive to national and international investors, and highlights the potential 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</p>	<p>direct business to the existing main employment areas. It is recognised that there may be need for strategic employment land at Crawley during the course of the plan period, though certainty as to the future of status of Gatwick safeguarding will be needed before options can be explored in full. This position is therefore reflected in the approach of submission local plan policy EC1. Further, the emerging policy recognises the land supply constraints facing Crawley, and if these cannot be overcome to accommodate employment need in Crawley, the council will work jointly alongside its neighbouring authorities under Duty to Cooperate to explore the scope for accommodating employment need either at the periphery of Crawley or near to Crawley.</p> <p>Noted.</p>

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					Sussex College and the University of Brighton.	
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>	Noted. The Economic Growth Assessment (2013) identifies a qualitative and quantitative need for additional business floorspace at Crawley. To help meet this need, the council is seeking to direct business to the existing main employment areas. The Local Plan recognises this position, and seeks to identify land to accommodate identified employment need, possibly in the form of a strategic employment location, where this would complement the existing offer at Manor Royal. This position is reflected in the approach of submission local plan policy EC1.
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.	Noted. The Economic Growth Assessment (2013) identifies a qualitative and quantitative need for additional business floorspace at Crawley. To help meet this need, the council is seeking to direct business to the existing main employment areas. It is recognised that there may be need for additional employment land at Crawley during the course of the plan period, though certainty as to the future of status of Gatwick safeguarding will be needed before options can be explored in full. This position is therefore reflected

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						in the approach of submission local plan policy EC1.
Tim	Hoskinson	Savills	Wilky Group	Spatial Development Strategy	<p>...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 role.</p> <p>To achieve additionality and up-skilling and to ensure that Crawley-Gatwick remain competitive into the future will require the right kind and quality of locational opportunity to be provided. This means strategic employment site with primacy of location at the regional gateway, adjacent to the transport hub and rail station in order to attract inward investment, provide scope for innovation and to enable the knowledge led economy to prosper at Crawley-Gatwick, in competition with other areas in the South East, with other regions in Europe and other regions in the world. If Crawley-Gatwick does not take the initiative in this regard, it will be left behind.</p> <p>A strategic employment and innovation campus at Gatwick Green is proposed as a coherent response to meeting regional, sub-regional and local level employment needs. Reference is made to the accompanying Gatwick Green evidence base documents which have submitted in previous representations and which together with the Council's commissioned Employment Land Review provide a compelling argument for the allocation of a strategically located site adjoining Gatwick Airport for use as a dynamic employment, innovation, education and community campus.</p>	<p>Noted. The Economic Growth Assessment (2013) identifies a qualitative and quantitative need for additional business floorspace at Crawley. To help meet this need, the council is seeking to direct business to the existing main employment areas. It is recognised that there may be need for additional employment land at Crawley during the course of the plan period, though certainty as to the future of status of Gatwick safeguarded will be needed before options can be explored in full. This position is therefore reflected in the approach of submission local plan policy EC1.</p>

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					Gatwick Green can achieve and deliver this in a manner which adds to the overall economic strength of the area whilst not prejudicing Manor Royal, Town Centre North or other employment components. Gatwick Green is complementary to these other sites, not competing with them, and should be recognised as an integral part of the strategy for economic growth. Previously submitted evidence demonstrates this complementarity....	
Tim	Hoskinson	Savills	Wilky Group	Spatial Development Strategy	...SEE REP... Given these consideration, housing delivery should not hold back strategic employment provision. The identification of a new strategic campus style business park as part of the employment offering for Crawley should be planned for as part of a balanced approach to delivering housing and jobs	The Local Plan recognises the constrained nature of Crawley, and limited available land supply. For this reason, the Local Plan strikes a balance between the competing demands to deliver residential and economic development whilst ensuring an appropriate provision of open space.
Tim	Hoskinson	Savills	Wilky Group	Spatial Development Strategy	<p>26. This section of the plan notes that the identification of the Crawley/Gatwick area as a centre for significant change, with associated commercial and residential growth, may present a challenge to the area with regard to rapid growth and change to both the size and form of the town as well as how people use the area.</p> <p>27. It is important for the plan to recognise the economic and social dimensions of sustainable development, and express the local planning authority's commitment to supporting the delivery of development that complies with carbon reduction, renewable energy, sustainable construction and biodiversity targets. Opportunities for exemplar projects such as the proposals for Gatwick Green should be encouraged.</p>	Noted. The Local Plan policy approach will seek to promote sustainable development .

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Tim	Hoskinson	Savills	Wilky Group	Spatial Development Strategy	The recognition of Crawley's excellent transport links and the commitment to planning new development to maximise links in this network and opportunities for sustainable transport in this section of the plan is supported. In this respect Gatwick Green offers an unrivalled opportunity to meet strategic policy objectives by harnessing the potential of Gatwick Airport as a regional economic hub combined with its proximity to Gatwick railway station and transport interchange.	Noted. The Local Plan seeks to promote sustainable economic development. In identifying potential locations for future employment, regard will be had (among other considerations) to the sustainability of the site in question, including the scope to link with the existing sustainable transport network.
Katherine	Harrison	Surrey County Council	0	STRAT 4	<p>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 Borough Council's pledge to reducing waste in Crawley should therefore be strengthened by amending Objective 16 on page 30 to read: "Objective 16: To work towards ensuring Crawley is a carbon neutral and zero waste town by 2050." To follow this through, Policy STRAT4 and Policy ENV 1 should be revised by the addition of the words "and zero waste" immediately following the words "carbon neutral" in line 2 of Policy STRAT4 on page 34 and in line 2/3 of Policy ENV 1 on page 96. For completeness and to improve consistency, the words "and zero waste" should also be inserted after the other references to "carbon neutral" throughout the Local Plan.</p> <p>These amendments would helpfully provide further impetus to minimise waste arisings and</p>	Comments noted. References have been added to waste throughout the Local Plan where it is seen to be appropriate.

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					reduce residual waste exports to surrounding areas which have the potential to increase in the medium term. This is important as the draft West Sussex Waste Local Plan (June 2012) accepts that existing landfill capacity within West Sussex will run down over the first part of the plan period and no provision is made for future landfill sites through criteria based policies or allocations other than a small extension to an existing landfill.	
Tim	Hoskinson	Savills	Wilky Group	STRAT1	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.	Noted.
John	Lister	Natural England	0	STRAT1	Natural England welcome the wording within policy STRAT1 which is taken from the Planning Inspectorate model policy.	Comment noted
Tim	Hoskinson	Savills	Wilky Group	STRAT2	...SEE FULL REP - The draft Local Plan does not address either strategic or location specific proposals for a high quality B1 business hub and innovation park along the lines proposed at Gatwick Green, either as a concept or locationally at Gatwick Green. The failure of the draft local plan to provide for this form of development is an issue of soundness for the plan.	Noted. The Economic Growth Assessment (2013) identifies a qualitative and quantitative need for additional business floorspace at Crawley. To help meet this need, the council is seeking to direct business to the existing main employment areas. It is recognised that there may be need for additional employment land at Crawley during the course of the plan period, though certainty as to the future of status of Gatwick safeguarding will be needed before

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						options can be explored in full. This position is therefore reflected in the approach of submission local plan policy EC1.
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>	Comment noted.
James	Stevens	Home Builders Federation	0	STRAT3	We note that scale of the housing need that is likely to materialise over the proposed plan period up to 2029. The NLP report that the	Comments noted. The Council fully recognises these issues and acknowledges this in the plan.

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
		Ltd			<p>Council has commissioned indicates that an additional 8,100 new homes would be needed to accommodate the future housing needs of the Borough (based on the baseline demographic natural change), and the Council has referred to this on page 15 of the preferred option of the Local Plan. The draft Local Plan is proposing to provide 3,543 net additions over the 15 year plan period running from 2014-2029. This equates to an annual average of 236 net additions per annum.</p> <p>We acknowledge the constraints that confront Crawley and the impracticality of the Council addressing wholly its entire housing needs within its own administrative boundaries. It was for these reasons that the South East Plan (SEP) set out in policy GAT3: Housing Distribution how meeting the Borough's housing needs would take the form of housing developments at or adjoining Crawley, thereby complementing its role as a transport hub and regional centre. As the SEP indicated, this would most likely involve (indeed, the only feasible solution) the westward expansion of Crawley into the neighbouring authority of Mid Sussex, complemented by the North East expansion of Crawley itself within its own administrative boundary.</p> <p>Clearly then, in order to meet the housing requirement of the SEP, this requires Crawley to cooperate and reach an agreement with Mid Sussex Council. If this cooperation is not forthcoming, then Crawley's housing requirement will have to be a capacity constrained target. The Borough will be unable to meet the objectively assessed level of need of 8,100 homes. The Borough acknowledges itself on page 80 of the draft Local Plan.</p>	

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					This is the central issue that the emerging Local Plan will have to address.	
Tony	Fullwood	Tony Fullwood Associates	Mr M Robinson	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 Oaksworth, Worth, remains available and should be considered as suitable for housing development. This is likely to require an amendment to the Built Up Area Boundary and/or an amendment to Policy CH12.	The review of the Built-Up Area Boundary seeks to delineate Crawley's urban area from the rural fringe and countryside beyond. Policy CH12 covers the area outside the BUAB and will encourage development appropriate to the location in line with the strategic aims of the Local Plan.
Cath	Rose	Reigate & Banstead Borough Council	0	STRAT3	We support the recognition of the benefits of ongoing cross boundary working and the commitment from CBC to positively consider proposals for the provision of housing to meet local needs and needs across the wider HMA. Reigate and Banstead falls within the local East Surrey Housing Market Area, also relating to, and functioning as part of, the wider Greater London HMA. There are also some more localised movements between the southern part of the borough (Horley) and Crawley, although we do not consider these to be strategic in nature. We welcome the work that is being carried out by those authorities in the North West Sussex HMA (Crawley, Mid Sussex and Horsham) to explore future housing provision across the 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	Comment noted and welcomed. Crawley Borough Council will continue to work proactively with Reigate and Banstead Borough Council to address cross boundary strategic matters and gain a better understanding of the fluid nature of the housing market across both the North West Sussex and East Surrey Housing Market Area (HMA). Crawley particularly welcomes the acknowledgement within the Reigate and Banstead Core Strategy of the relationship of some of the housing provided within the Reigate and Banstead borough will meet needs from the northern West Sussex HMA. Discussions are continuing across the northern West Sussex authorities and there is an understanding that some of the unmet demographic housing needs

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					submission.	of Crawley will have to be accommodated across the wider Housing Market Area including both the North West Sussex Housing Market Area which encompasses Horsham District and Mid Sussex District as well as the East Surrey Housing Market incorporating Reigate and Banstead Borough. This is consistent with the requirements of the NPPF, para 47 which states that Local Plans should meet the full objectively assessed needs for market and affordable housing across the Housing Market Area.
Jack	Straw	Mole Valley District Council	0	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</p>	Comment noted. Crawley Borough Council will continue to work proactively with Reigate and Banstead Borough Council to address cross boundary strategic matters and gain a better understanding of the fluid nature of the housing market across both the North West Sussex and East Surrey Housing Market Area. It is acknowledged that some of the unmet demographic housing needs of Crawley will have to be accommodated across the wider Housing Market Area including both the North West Sussex Housing Market Area which encompasses Horsham District and Mid Sussex District as well as the East Surrey Housing Market incorporating Reigate and Banstead Borough. This is

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					and travel to work patterns.	consistent with the requirements of the NPPF, para 47 which states that Local Plans should meet the full objectively assessed needs for market and affordable housing across the Housing Market Area.
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.	The review of the built up area boundary seeks to delineate Crawley's urban area from the rural fringe and countryside beyond. Policy CH12 covers the area outside the BUAB and will encourage development appropriate to the location in line with the strategic aims of the Local Plan.
Tim	Hoskinson	Savills	Wilky Group	STRAT3	<p>48. The approach set out in Policy STAT3 seeks to respond positively to proposals for the provision of housing, taking a pro-active approach to identifying suitable sites for housing development, working to overcome constraints where possible, and considering all reasonable opportunities. This is supported as a means of ensuring housing needs are met as far as possible, having regard to environmental constraints and the suitability of development sites.</p> <p>49. Also supported is the recognition that continued cross-boundary working is essential to understand the nature of the wider housing market area and ensure housing needs are being met in an appropriate and functional manner. This approach will ensure a balanced delivery of housing and jobs can be delivered, taking into account the identification of a new strategic campus style business park as part of</p>	Comments with regard to maximising housing delivery and cross boundary working welcomed.

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					the employment offering for Crawley as set out in our response to Economic Growth Policies STRAT2 and EC1.	
Mark	Bewsey	Savills	Homes and Communities Agency	STRAT3	Support – The HCA welcomes the positive approach which CBC will take towards considering proposals for the provision of housing to meet local housing needs. The HCA also welcomes the commitment to work to overcome constraints wherever possible, in this approach accords with NPPF paragraph 187 which requires local planning authorities to 'look for solutions rather than problems'.	Comment noted
Elizabeth	Burt	Savills	Crest Strategic Projects	STRAT3	Key diagram, page 14 and duty to co-operate, pages 23-25, 33, policy STRAT3 – CSP welcomes the identification of Kilnwood Vale on the key diagram as this clearly shows the relationship of the site with CBC. It also notes that a number of other sites within its boundary but not outside of this have been identified for the delivery of housing. Paragraph 179 of the National Planning Policy Framework (NPPF) states “Local Planning Authorities should work collaboratively with other bodies to ensure that strategic priorities across local boundaries are properly coordinated and clearly reflected in Local Plans. Joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas”. In addition paragraph 181 of the NPPF states that “Local Planning Authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination” and “Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in	Paragraph 47 of the NPPF identifies that local planning authorities should use their evidence base to meet objectively assessed housing needs in full. The Local Plan recognises this requirement and identifies a series of housing numbers according to a range of demographic, economic and housing scenarios. These range from 120 dwellings per annum under a static employment scenario to 664 dwellings per annum based upon the continuation of short term migration trends. The baseline demographic scenario would require 542 dwellings to be built each year over the plan period. The Local Plan identifies that the constrained nature of land supply in Crawley means that it will not be possible to meet objectively assessed needs in full and that a large proportion of the borough’s demographic housing needs over the next 15

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					<p>place to provide the land and infrastructure necessary to support current and projected future levels of development". Such cross boundary issues include the delivery of housing. The Duty to Co-operate requirement is also contained in the Localism Act which requires Local Authorities to work together on cross boundary strategic issues. As is demonstrated later in this letter the housing target CBC has proposed is not based on objectively assessed needs for market and affordable housing in the housing market area as required by paragraph 47 of the NPPF. It is identified that the Borough is constrained in terms of available land and therefore it is key that the Council looks to assess the potential of providing housing on sites outside the Borough boundary to meet the identified need.</p> <p>CSP has noted that 'Strategic Issues' are identified on pages 24-25 of the consultation document as having been discussed with neighbouring authorities, but there is no detail on what these discussions were and what the outcomes were, i.e. was there commitment or an identification of an opportunity to work jointly and to deliver some development requirements outside the Borough boundary to meet identified housing need? Paragraph 47 of the NPPF requires the use of an evidence base to ensure Local Plans meet the full, objectively assessed needs for market and affordable housing in the housing market area and paragraph 14 requires local planning authorities to positively seek opportunities to meet the development needs of their area.</p> <p>HDC is within the same housing market area as CBC, the North West Sussex Housing Market</p>	<p>years cannot be met within the borough boundaries and will therefore need to be met across the wider housing market area. Paragraph 179 of the NPPF identifies that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas due to a lack of physical capacity. Crawley Borough Council is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is on this basis, that the Local Plan seeks to be compliant with the requirements of the NPPF and therefore sound.</p>

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					area, and it is therefore key that CBC engages with HDC to discuss potential cross boundary issues and opportunities for the delivery of housing within HDC's boundary to meet some of CBC's need. As highlighted CSP has an interest in land between west of Bewbush and Faygate which is in close proximity to the CBC administrative boundary. This site presents the opportunity for development to be delivered which could meet some of Crawley's housing growth requirements over its plan period to 2029 (discussed in greater detail under the housing heading in this letter). We would strongly recommend that CBC and HDC engage and work together on potential strategies for the delivery of housing over their plan periods including the consideration for delivering housing to meet the needs of CBC outside its boundary.	
Elizabeth	Burt	Savills	Crest Strategic Projects	STRAT3	Gatwick Diamond, page 17 and 33, policy STRAT3 – This paragraph confirms that Crawley is situated centrally within the Gatwick Diamond strategic area and the Borough offers the focus for large businesses, travel and retail provision with good representation in the business services and manufacturing sectors. It makes clear that the Local Plan will ensure that Crawley's wider role will be supported but does not identify that constraints mean the housing needs of the whole population cannot all be met within the administrative boundaries of the Borough. This adds clear weight to the need to work with HDC to discuss and identify a potential opportunity for the delivery of housing outside the Borough boundary to ensure housing need is met.	Paragraph 47 of the NPPF identifies that local planning authorities should use their evidence base to meet objectively assessed housing needs in full. The Local Plan identifies that the constrained nature of land supply in Crawley means that it will not be possible to meet objectively assessed needs in full and that a large proportion of the borough's demographic housing needs over the next 15 years cannot be met within the borough boundaries and will therefore need to be met across the wider housing market area. Paragraph 179 of the NPPF identifies that joint working should enable local planning authorities to work together to meet

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
						development requirements which cannot wholly be met within their own areas due to a lack of physical capacity. Crawley Borough Council is actively working with adjoining local authorities across the Gatwick Diamond area including Horsham District Council to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is on this basis, that the Local Plan seeks to be compliant with the requirements of the NPPF and therefore sound.
Tricia	Butcher	The British Horse Society	0	STRAT4	Strategic Objective 3 "protect, enhance and create opportunities for Crawley's unique Green Infrastructure" is strongly supported.	Noted - comment refers to Strat 4
Jane	Noble	West Sussex Local Access Forum	0	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.	Noted.
Tim	Hoskinson	Savills	Wilky Group	STRAT4	1. Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change; 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 biodiversity whilst being aligned closely with the employment, education and health needs of surrounding communities.	Noted.
Tim	Hoskinson	Savills	Wilky Group	STRAT4	2. Complements Crawley's character as a	Noted.

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					compact town within a countryside setting, developed on a neighbourhood principle; The Gatwick Green site is largely in agricultural use, although it does include some employment uses. The site is bounded by the airport to the west and the M23 to the north and east, and has the potential to accommodate strategic employment development in a manner that compliments Crawley's character and delivers a range landscape and ecological mitigation and enhancement measures.	
Tim	Hoskinson	Savills	Wilky Group	STRAT4	3. Protects, enhances and creates opportunities for Crawley's unique Green Infrastructure; The Gatwick Green proposals, which will embrace a landscape and ecology strategy that will aim to integrate existing trees and hedgerows and enhance the contribution they make to wildlife habitats and the wider green infrastructure of the locality. By extending existing wildlife habitats and creating new ones, a significant biodiversity enhancement will be achieved across the site. The proposed site for Gatwick Green offers opportunities not just for accommodating strategic development, but for the development itself to fund and deliver environmental improvements, new footpaths / cycleways, green areas and other infrastructure as it proceeds.	Noted.
Tim	Hoskinson	Savills	Wilky Group	STRAT4	4. Provides a safe and secure environment; and The Gatwick Green development will reflect contemporary design and sustainability credentials with an emphasis on high quality design of buildings, spaces, landscape and public realm.	Noted.
Tim	Hoskinson	Savills	Wilky Group	STRAT4	5. Does not conflict with other policies and objectives set out in this Plan. As set out in these representations and the supporting evidence base, the proposals for	Noted.

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					Gatwick Green is entirely compatible with the objectives of delivering sustainable development set out in the Plan. Proposed changes to policies EC1 and GAT2 are proposed to ensure consistency with the plan.	
John	Lister	Natural England	0	STRAT4	Natural England support points 1-3 of policy STRAT4 which state; Development will be supported where it meets the following strategic objectives: 1. Progress towards Crawley's commitment to being carbon neutral by 2050 and adapts to climate change; 2. Complements Crawley's character as a compact town within a countryside setting, developed on a neighbourhood principle; 3. Protects, enhances and creates opportunities for Crawley's unique Green Infrastructure. Natural England emphasise the diverse benefits of Green Infrastructure networks; benefiting biodiversity, creating green links between areas, improving health by encouraging a more diverse range of transport modes.	Comments noted - The local plan will require Green Infrastructure to support development.
Tricia	Butcher	The British Horse Society	0		Green Infrastructure (pg 22) This paragraph is strongly supported. The network of green infrastructure, including green corridors, must be protected because of the many benefits it brings.	It is important that the existing network of green infrastructure is conserved and enhanced where valued to support new development.
Tricia	Butcher	The British Horse Society	0		Corporate Plan (pg 27) - support is given to priority 6, although specific reference to informal leisure activities would have been preferred	Comment noted - priorities 7 and 8 does relate to the natural environment/public open spaces where informal leisure activities take place
Tricia	Butcher	The British Horse Society	0		Page 34 - Bullet points 2, 3, and 4 are all supported as key environmental aims.	Noted
Katherine	Harrison	Surrey County	0		The promotion of a high standard of sustainable construction, through Objective 17 on page 30,	Noted. It is intended that BREEAM and CfSH will be central to the

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		Council			and through the promotion of the Code for Sustainable Homes and BREEAM in Policy ENV 1 on page 96, is supported as this will ensure compliance with the Site Waste Management Plan Regulations 2008 through supporting the re-use and recycling of construction, demolition and excavation waste (CDEW) and the 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.	plans environmental policy as it progresses to Submission.
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		As set out in Section 2 above, it is considered that provision of 8,100 dwellings from 2014-2029 is the most sustainable and appropriate level of growth in order for the Preferred Strategy to be found sound.	In view of the constrained nature of housing supply in the Borough, it is considered that the only way in which the Local Plan could be found sound given the need to provide a continuous 5 year land supply (plus 5% buffer), is to adopt a 'supply-led' housing requirement for the plan period, one which is capable of being delivered throughout the plan period. There would be a significant risk to the delivery of the Local Plan if the chosen housing figure was incapable of being delivered due to supply side constraints. Policy STRAT3 recognises that all reasonable opportunities for housing development will be considered including brownfield sites, surplus green space and town centre living.
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		The identified deficit in housing supply needs to be addressed in line with the strategy of locating development in sustainable locations that are not physically constrained. In seeking to meet this	This land remains outside the Built Up Area Boundary in the rural fringe. It is therefore subject to countryside policies. The site is

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					deficit it is clear that land south of Antlands Lane can assist in meeting the shortfall in a sustainable manner, in accordance with the spatial strategy.	also located within the land safeguarded for a second wide-spaced runway at Gatwick. This effectively prevents development (such as housing) which would be incompatible with the expansion of the airport. The site is also significantly affected by airport noise and is located within the 69 and 72dB(A) predicted air noise contours for a twin runway (Gatwick Master Plan, July 2012). This effectively prevents the site from being considered suitable for housing. There are also a number of other factors which would prevent the site being considered suitable for housing including the presence of Ancient Woodland.
Chris	Owen	West Sussex County Council	0		Spatial Development Strategy – Sustainability and Green Infrastructure: Reference to 'Sites of Nature Conservation Interest' in paragraph (i) should be amended to read 'Sites of Nature Conservation Importance'.	Noted. This wording will be changed.
Robin	Shepherd	Barton Willmore	Mayfield Market Towns Ltd		SEE FULL REP - Mayfield Market Towns Ltd are promoting a New Market Town, between Sayers Common and Henfield on the A23, as a fundamental part of housing delivery in the Crawley/Gatwick Sub- Region. A New Market Town is not a new concept and is considered by the GL Hearn New Market Town Study that was produced in Summer 2010 and was jointly commissioned by Crawley Borough Council, Horsham District Council and Mid Sussex District Council. Crawley Borough Council state, in an Explanatory Note on the findings of the GL Hearn New Market Town Study, that the	Comments noted, the council is fully aware that it is not able to meet its objectively assessed housing needs and that any unmet need will need to be accommodated across the wider Housing Market Area, in so far as is consistent with the principles of sustainable development, including the North West Sussex and Surrey East Housing Market Area. This is reflected in the Joint Position Statement between Crawley

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					conclusions from the study demonstrate that a New Market Town is feasible.	Borough Council, Mid Sussex District Council and Horsham District Council, and recognised in amended supporting text within the Reigate and Banstead Core Strategy.
Elizabeth	Burt	Savills	Crest Strategic Projects		<p>Housing need, page 19 (see also detailed comments under the Housing heading) - The Council recognises that increasing population growth will place demand on the need for housing. CSP acknowledges this and supports the Council's recognition that "In line with national guidance, sufficient housing should be provided to meet the needs (our emphasis) of existing and future households across the housing market area as well as to provide an appropriate amount to sustain the local economy" (page 20). This accords with the NPPF at paragraphs 7 and 17 which makes clear that planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local plans that the country needs. It states that "Every effort should be made objectively to identify and then meet the housing, business and other development needs (our emphasis) of an area, and respond positively to wider opportunities for growth."</p> <p>Concerns are raised that whilst CBC has commissioned an evidence base which shows a number of scenarios for housing need (Table 1 of the consultation document), it has chosen a housing target (policy H1) based on potential housing supply as set out in the SHLAA. The housing figure put forward is 3,543 net dwellings between 2014 and 2029. This does not appear to be based on the objectively assessed housing</p>	Paragraph 47 of the NPPF identifies that local planning authorities should use their evidence base to meet objectively assessed housing needs in full. The Local Plan recognises this requirement and identifies a series of housing numbers according to a range of demographic, economic and housing scenarios. These range from 120 dwellings per annum under a static employment scenario to 664 dwellings per annum based upon the continuation of short term migration trends. The baseline demographic scenario would require 542 dwellings to be built each year over the plan period. The Local Plan identifies that the constrained nature of land supply in Crawley means that it will not be possible to meet objectively assessed needs in full and that a large proportion of the borough's demographic housing needs over the next 15 years cannot be met within the borough boundaries and will therefore need to be met across the wider housing market area. Paragraph 179 of the NPPF identifies that joint working should

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					needs of the Borough. In Table 1 of the consultation document, it identifies that for the 'baseline' demographic 'no change' scenario, there is a need for 542 dwellings per annum which equates to 8,130 dwellings over the plan period. This is significantly different to the housing figure proposed by the Council in policy H1. Full comments on the housing figure put forward and identified housing need is provided in the housing section later in this report.	enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas due to a lack of physical capacity. Crawley Borough Council is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is on this basis, that the Local Plan seeks to be compliant with the requirements of the NPPF and therefore sound.

Character						
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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.	Noted.
Chris	Owen	West Sussex County Council		CH10	Part B: English Heritage has prepared a guidance note on	Noted. The local plan has been prepared in accordance with this guidance.

Character						
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					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.	
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>	The reasoned justification will be amended to refer to the Crawley Baseline Character Assessment 2009. The Policy, supporting paragraph and reasoned justification will be expanded to provide more specific guidance on the qualities that each Important View seeks to protect and circumstances in which applicants would need to support their proposals with additional information. Within the Manor Royal Business Estate, there are linear contained views along Manor Royal and Fleming Way. The quality of development proposals is therefore important and this issue will be addressed in the emerging Manor Royal Design Guide SPD and Public Realm Strategy.
Tony	Fullwood	Tony Fullwood Associates	Mr M Robinson	CH12	<p>OBJECTION - The policy is not positively worded to allow housing development which other parts of the evidence base consider to be acceptable in certain locations outside the built up area boundary as currently defined. Worth is an area at the urban/rural fringe that is suitable for housing development.</p> <p>The policy identifies that the prime test concerning development outside the built up area is not</p>	Comments noted - the policy will be reviewed to ensure a clear policy approach to housing in Crawley urban/rural fringe.

Character						
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					<p>adversely affecting the character of the countryside. This is reiterated in the reasoned justification:</p> <p>Certain types of development may alter one or more important elements that make up a Character Area or Edge. This is acceptable if the overall character is not compromised and measures are taken to limit impacts on the character through mitigation and/or enhancement. This may be the strengthening of other elements of the area's character or general enhancement through increased biodiversity, green links and other mitigation measures.</p> <p>The countryside area around Crawley is not extensive, and in most cases, any residential development would not be remote from the town's infrastructure and services, and would be sustainably located. In the case of Worth, the countryside is defined as including existing areas of housing. For these reasons, it is inappropriate for the reasoned justification to refer to Paragraph 55 of the NPPF as the reason for omitting reference to housing in this policy as residential development in such areas would clearly not result in 'isolated homes in the countryside'. The reasoned justification and policy should be amended to make clear that where residential development would result in isolated new homes in the countryside it would not be considered appropriate.</p> <p>The policy is currently over-restrictive. The principle test is whether development would adversely affect the character of the countryside. The Policy should be reworded as Alternative 1 or 2 below.... SEE FULL REP</p>	
Tony	Fullwood	Tony Fullwood Associates	Mrs J Williams	CH12	OBJECTION - The policy is not positively worded to allow housing development which other parts of the evidence base consider to be acceptable in	Comments noted - the policy will be reviewed to ensure a clear policy approach to housing in

Character						
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					<p>certain locations outside the built up area boundary as currently defined. Worth is an area at the urban/rural fringe that is suitable for housing development.</p> <p>The policy identifies that the prime test concerning development outside the built up area is not adversely affecting the character of the countryside. This is reiterated in the reasoned justification:</p> <p>Certain types of development may alter one or more important elements that make up a Character Area or Edge. This is acceptable if the overall character is not compromised and measures are taken to limit impacts on the character through mitigation and/or enhancement. This may be the strengthening of other elements of the area's character or general enhancement through increased biodiversity, green links and other mitigation measures.</p> <p>The countryside area around Crawley is not extensive, and in most cases, any residential development would not be remote from the town's infrastructure and services, and would be sustainably located. In the case of Worth, the countryside is defined as including existing areas of housing. For these reasons, it is inappropriate for the reasoned justification to refer to Paragraph 55 of the NPPF as the reason for omitting reference to housing in this policy as residential development in such areas would clearly not result in 'isolated homes in the countryside'. The reasoned justification and policy should be amended to make clear that where residential development would result in isolated new homes in the countryside it would not be considered appropriate.</p>	Crawley urban/rural fringe.
John	Lister	Natural England		CH12	Natural England support the protection of the countryside and natural environment as detailed	To create sustainable development, only proposals which

Character						
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					within policy CH12. It is clear that points i-ix within policy CH12 aim to protect and enhance the natural environment that surrounds the built up areas of the Borough. Furthermore, within the justification text, it is detailed that; in order to ensure development respects the unique landscape area in which it is proposed there may be additional policies for each landscape area. This will provide an opportunity to be more prescriptive as to the development that is acceptable on a place by place basis.	respect the character of that area will be encouraged.
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.	Noted.
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.	The Crawley Borough Local Plan would not need to repeat the Waste Plan and the potential benefits of recycled materials would be assessed at part of the Code for Sustainable Homes design stage assessment.
David	Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH3	SEE FULL REP - 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. 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	The space standards form part of the Local Plan and the evidence base will therefore be subject to scrutiny as part of the development plan process. Supplementary planning documents will be prepared in accordance with the Council's Statement of Community Involvement and Government guidance and regulations. The issue of viability is acknowledged and has been investigated. The aim of the policy is to ensure that housing provides sufficient space for the number of occupants.

Character						
Names	Surname	Organisation	On behalf of	Policy No.	Comments	CBC Response
					states:- "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."	
John	Lister	Natural England	0	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.	Noted.
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.	In terms of this Policy the area contributes to the structure of the town through its tree cover and topography. The well-treed hill also forms one important part of the setting of the Grade 1 listed church of St Nicholas which is a local landmark and contributes to the structure of the Borough. The Policy would restrict development that eroded the tree cover and/or introduced prominent built forms. Development in the area may however be restricted by other

Character						
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						designations such as Listed Buildings and the Conservation Area. The extent of the areas within the Borough covered by the designation will be subject to further investigation.
Tony	Fullwood	Tony Fullwood Associates	Mrs J Williams	CH4	<p>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.</p> <p>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.</p>	In terms of this Policy the area contributes to the structure of the town through its tree cover and topography. The well-treed hill also forms one important part of the setting of the Grade 1 listed church of St Nicholas which is a local landmark and contributes to the structure of the Borough. The Policy would restrict development that eroded the tree cover and/or introduced prominent built forms. Development in the area may however be restricted by other designations such as Listed Buildings and the Conservation Area. The extent of the areas covered by the designation within the Borough will be subject to further investigation.
David	Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH6	<p>SEE FULL REP -</p> <p>"...if such standards..." (space standards) "...are slavishly applied and result in less efficient housing layouts, then additional land will be required for housing further worsening the already desperate housing supply position in Crawley."</p>	The Policy objective is development that is fit for purpose in terms of the internal and external space that it provides for its occupants. Amenity is a key planning consideration and policy should seek to prevent the negative impacts of over-development or overcrowding. The Council will undertake further work to ensure that the basis for any minimum space standards is

Character						
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						clearly set out and discussed and subject to scrutiny as part of the development plan process. The number of bed spaces within a dwelling and the apportionment of garden space throughout a development between dwellings of different sizes and types also affects the efficient use of land.
Tony	Fullwood	Tony Fullwood Associates	Mr M Robinson	CH8	<p>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 therefore over-restrictive and no longer appropriate to development within a Conservation Area. Conservation Areas rarely comprise an area of single character; rather a number of distinctive character areas are often present. It is therefore inappropriate to include the term 'cohesive character' in relation to a conservation area as a whole. The policy should be reworded as follows.... SEE FULL REP</p>	<p>Objection Noted. We accept that the wording is not positively framed and this will be reworded. Whilst paragraph 58 does state that development should "respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;", the NPPF also states that importance of heritage assets as an irreplaceable resource and paragraph 140 provides Local Planning Authorities the opportunity to place stricter controls to ensure that the future conservation of heritage assets are secured. Point noted about Conservation Areas often having multiple Character Zones, this will be incorporated within the plan.</p>
Tony	Fullwood	Tony Fullwood Associates	Mrs J Williams	CH8	<p>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</p>	<p>Objection Noted. We accept that the wording is not positively framed and this will be reworded. Whilst paragraph 58 does state that development should "respond to local character and history, and reflect the identity of local</p>

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					<p>preventing or discouraging appropriate innovation. The term 'respects' is therefore over-restrictive and no longer appropriate to development within a Conservation Area.</p> <p>Conservation Areas rarely comprise an area of single character; rather a number of distinctive character areas are often present. It is therefore inappropriate to include the term 'cohesive character' in relation to a conservation area as a whole.</p> <p>The policy should be reworded as follows: Policy CH8: National Heritage Designations CH8 Part A: Conservation Areas</p> <p>In Conservation Areas, development will be permitted where it would preserve and enhance the character and appearance of the area. Development will need to demonstrate consideration has been given to all of the following criteria:</p> <p>i) Respond to the identifiable and distinctive character of the area ii) – v) as existing</p>	<p>surroundings and materials, while not preventing or discouraging appropriate innovation;" the NPPF also states that importance of heritage assets as an irreplaceable resource and paragraph 140 provides Local Planning Authorities the opportunity to place stricter controls to ensure that the future conservation of heritage assets are secured. Point noted about Conservation Areas often having multiple Character Zones, this will be incorporated within the plan.</p>
John	Lister	Natural England		p.40	<p>Natural England notes and encourages the importance that is given to the protection of the countryside in the policy justification text of chapter 6 which states: 'Crawley's countryside is an extremely valuable asset for the community, which should be conserved and enhanced in a positive way. This must be integrated with the need to achieve the wider vision and objectives, and the local plan will support sustainable development within the countryside'.</p> <p>Natural England notes that, in securing sustainable development objectives, there may be a need to develop areas that impact on views and landscapes that are considered important. A fine balance of ensuring sustainable development and</p>	<p>The local plan will recognise and reflect the value and role of Crawley's urban/rural fringe areas and open countryside beyond, to ensure sustainable development.</p>

Character						
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					<p>protecting identified views and landscapes will require careful justification across the entire spectrum of the sustainable development agenda, including the consequences of climate change upon such landscapes.</p> <p>Furthermore a presumption in favour of sustainable development is highlighted within national guidance the NPPF, as the golden thread which should be seen to run through both plan-making and decision taking.</p>	
Chris	Owen	West Sussex County Council			<p>Local Heritage Assets:</p> <p>The following introductory paragraph to this section is suggested:</p> <p>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.</p> <p>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.</p>	Comment Noted. The request for references to the HER and EUS is noted and will be incorporated within the plan.
Brenda	Burgess				<p>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</p>	Noted. In June 2010, a review was undertaken of key buildings within the Borough. At the time, Three Bridges Station was discussed for inclusion on the Crawley Local

Character						
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					building with in the neighbourhoods	Building List however it was not progressed as only the facade was deemed to be of importance. The Local List will be updated in the future and the Station will be assessed again at that time as to whether it should be locally, or nationally listed.
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)	Noted. In June 2010, a review was undertaken of key buildings within the Borough. At the time the Town Hall was discussed for inclusion on the Crawley Local Building List however it was not progressed. The Local List will be updated in the future and the Town Hall will be assessed again at that time as to whether it should be locally, or nationally listed.
Jenny	Frost	Ifield Village Conservation Area Advisory Committee			<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>	Preferred policy CH12 sets out the approach to development outside the built up area boundary which is to allow certain types of development that do not adversely affect the character of that area.

Character						
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					<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>	
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>	<p>The Crawley Landscape Character Assessment Part 1 can be found in the background documents section and is also referred to in preferred Policy CH12. The edge as drawn on the map relates to the area within Crawley and access beyond. The Kilnwood Vale site is considered in this assessment.</p>
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>	<p>Noted. The neighbourhood principle is recognised as a key aspect of Crawley's character, and also supports the principles of sustainable development. This will be reflected in the Local Plan.</p>

Character						
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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>	Noted. The Character and Environment chapters in particular acknowledge the role played by the natural environment.
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>	Comment noted - Areas deemed to be of suitable quality have been designated as Conservation Areas. Areas not seen to fulfil the criteria for Conservation Area designation have been designated as "Areas of Special Landscape Character".
John	Lister	Natural England			<ul style="list-style-type: none"> 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. <p>Natural England would wish to see further details and evidence of consideration of all landscapes in accordance with the Landscape Convention.</p>	<p>Agree. In terms of Policy CH11, the reasoned justification will be amended to refer to the Crawley Baseline Character Assessment 2009. The Policy, supporting paragraph and reasoned justification will be expanded to provide more specific guidance on the qualities that each Important View seeks to protect and circumstances in which applicants would need to support their proposals with additional information.</p> <p>The Crawley Landscape Character Assessment will cover areas of landscape outside the urban area of Crawley but within the administrative boundary. This area will be subject to policy CH12</p>

Character						
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						development beyond the built up area.

Names	Surname	Organisation	On behalf of	Policy No.	Comments	CBC Response
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.	Noted
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.	Noted. The local plan has been prepared in accordance with this guidance.

Economic Growth						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner	EC1	Similarly Policy EC1 which encourages economic growth is also supported.	Noted and support welcomed.
Cath	Rose	Reigate & Banstead Borough Council	0	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	The Council has recent undertaken an update of its Retail Capacity and Impact Study (2013). This has found there to be sufficient comparison goods expenditure available to support the scale of new retail development now emerging for Town Centre North, with only

Economic Growth						
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					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.	modest and achievable increases in market share of catchment area expenditure attracted by Crawley Town Centre. This means that such a development will be very unlikely to have any significant adverse impacts on the town centres in surrounding towns. It also means that for the purposes of plan preparation there is no need to undertake detailed testing of the likely impact upon surrounding town centres of the scheme now emerging at Town Centre North, as the impact of a much larger scheme has been fully tested in the RCIS, and found to be insignificant.
Wakako	Hirose	Rapleys LLP	T&L Crawley LLP	EC1	Policy EC1 suggests that the Council will support new economic activity and associated regeneration where proposals accord with specific roles allocated for the designated employment areas. The role identified for Manor Royal is to provide “the first choice for office, industrial warehousing in the south east.” This clearly does not reflect the status of my client’s site (BRETTS WAY), where the Council has already accepted the principle of non-B class use through its approval of retail use. In these terms, we strongly object to the proposed Main Employment Area designation for the Betts Way site. This approach is entirely in line with the National Planning Policy Framework (NPPF), which indicates that planning policies should avoid long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.	Noted. The NPPF is clear that the planning system should support and drive economic development, with Paragraph 20 in particular specifically requiring that local planning authorities plan positively to meet the needs of business. Manor Royal remains a key sub-regional destination for business, and it is considered appropriate to reflect this status in the local plan through its designation as a Main Employment Area. It is recognised that the NPPF definition of economic development is broader than the identified Manor Royal uses set out under policy EC1. The Economic Growth Assessment (2013) has made clear that the local plan should

Economic Growth						
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						seek to protect Manor Royal for business uses, though other uses may be permitted provided that they contribute positively to and support the business function of Manor Royal. As recognised in the NPPF, any economic development proposals falling within the definition of Main Town Centre uses would be required to demonstrate compliance with the sequential assessment and impact test.
Peter	Mason	Tandridge District Council	0	EC1	If Gatwick Airport is to expand to 45 million passengers per annum, robust environmental safeguards will be needed.	Noted. The Borough Council will negotiate a new legal agreement containing environmental safeguards at the appropriate time.
Tim	Hoskinson	Savills	Wilky Group	EC1	As stated in our comments on Policy STRAT2, there is a clear need for a strategic employment allocation in recognition of Crawley-Gatwick's strategic economic hub role. The supporting text highlights the need for planning policies to enhance the diverse economy of the town to encourage a range of new development from small start up units to major headquarters, however the approach currently set out in Policy EC1 is focused on existing employment areas and will not deliver the wider economic objectives for Crawley and the Gatwick Diamond.... SEE REP FOR MORE	Noted. The Preferred Strategy Local Plan has been developed having regard to the Northern West Sussex Employment Land Review (ELR) 2009/10, and the emerging policy approach has been drafted based on this evidence base. The local authorities are now progressing the Northern West Sussex Economic Growth Assessment (2013), which identifies significant demand for business/employment floorspace over the plan period. It has informed the approach of a revised Submission Local Plan Policy EC1 (Sustainable Economic Growth) which provides a strategic view of employment requirements within the borough,

Economic Growth						
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						and details the council's approach for meeting this demand.
Alyson	Jones	Barton Willmore	SEGRO	EC1	SEE FULL REP....SEGRO would urge CBC to think more flexibly about development opportunities across Manor Royal and the ability to introduce complementary uses and development which is supported by market demand. Manor Royal has scope to accommodate leisure, retail and other employment generating and complimentary uses and the Local Authority should positively look to embrace this opportunity and not discourage it.It should also be made clear that whilst the Local Plan seeks high design standards at key gateway sites and frontages, that this should not undermine or result in potential land uses being rejected on the basis that they cannot deliver for example land-mark office buildings, and that such sites, provided they are for an economic development activity, will be supported provided the overall design standard is appropriate.	Noted. The NPPF is clear that the planning system should support and drive economic development, with Paragraph 20 in particular specifically requiring that local planning authorities plan positively to meet the needs of business. The Economic Growth Assessment (2013) identifies a significant demand for employment floorspace over the plan period, outlines that in light of Crawley's limited employment land supply, Manor Royal should be protected as a destination for business uses. It is recognised that other employment generating uses may be appropriate where these would support the core business function at Manor Royal. Good design is seen as a key means of reinforcing the role of Manor Royal as a leading business destination. The Manor Royal Design Principles and Public Realm Strategy SPD will play an important role in expanding upon the emerging local plan policy. These documents will seek to ensure that new developments maximise opportunities to improve Manor Royal's environment, though it is acknowledged that an element of flexibility is required to ensure that appropriate employment

Economic Growth						
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						generating uses are encouraged.
John	Lister	Natural England	0	EC1	Natural England welcome the comment; 'Development proposals that create new economic activity and associated regeneration of the built environment will be proactively supported.' The regeneration of previously developed, urban areas will reduce the pressure on greenfield land for new development. These urban areas are also generally more sustainable locations for economic development as they are closer to infrastructure hubs and other existing services and amenities.	Support noted and welcomed.
Martyn	Chase	Stanhope plc	0	EC2	Policy EC2 allows for a phased delivery of sites within Town Centre North; we support this in respect of the variety of uses that will be pursued within the wider site boundary, but would re-enforce that any site proposals that come forward should in no way prejudice the delivery of the core retail phase.	Noted and agreed. The emerging local plan approach recognises TCN as a retail-led regeneration, and is clear to outline that the core retail phase remains a priority. As such, independent developments will only be permitted within the wider TCN allocation where it can be demonstrated that delivery of the core retail scheme will not be prejudiced, and contributes to the overall objectives of TCN.
Peter	Mason	Tandridge District Council	0	EC2	It is considered that the enhancement of the Town Centre should result in it having a role as a major public transport interchange serving the Gatwick sub-region leading to an improvement in the quality of existing facilities.	Noted. The Town Centre benefits from good rail links as well as being a hub for bus services from within and outside the town. The policies recognise that the facilities could be improved to help enhance this interchange role.
Mark	Bewsey	Savills	Homes and Communities Agency	EC2	Comment – The HCA welcomes CBC's aspiration to achieve a major mixed use redevelopment in the Town Centre North area.	Comment noted. A major mixed use scheme within the Town Centre, known as the Town

Economic Growth						
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					Given the status of Crawley as a Regional Hub and the major Town Centre in the Gatwick Diamond, it is key that the most efficient and effective use of land is made. Accordingly the HCA urges CBC to promote high density development through policy HC2. The HCA is keen to work with CBC as a key landholder and wishes to promote the Kilnmead site within the Town Centre North Area for residential development. The Kilnmead site occupies an ideal location for a residential development as it sits amongst residential dwellings and to the south of the residential hinterlands of north Crawley. The site is previously developed land and occupies a central location within the Town Centre boundary and the town centre north major mixed use development allocation.	Centre North allocation, is an aspiration of the Council. The council will seek to assess the Kilnmead site for housing during the Local Plan process, given its sustainable location.
Martyn	Chase	Stanhope plc	0	EC2 & EC3	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	Noted. The local plan reflects the guidance of the NPPF in directing new retail proposals to the town centre. The policy approach broadly seeks to retain a concentration of retail uses at Primary Shopping Frontages, though is more flexible to allow other Main Town Centre Uses at Secondary Frontages. Locally specific impact thresholds have been identified in the plan to ensure that proposals for out of centre retail development demonstrate in full whether there will be an impact on the vitality and viability of the town centre as existing and proposed.
Mark	Bewsey	Savills	Homes and Communities	EC3	Support – The HCA agrees that Crawley Town Centre should be promoted as a sustainable	Comment noted and support welcomed.

Economic Growth						
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			Agency		and desirable place to live, and welcomes the emphasis on the provision of housing as a key aspect of the mixed-use development opportunities identified. The encouragement of the mixed-use development of under-used land within the Town Centre Boundary is also welcomed.	
John	Lister	Natural England	0	EC3	Natural England support the redevelopment of “outworn buildings” so long as they are within suitable locations as this may help to reduce the reliance on greenfield sites for new development. Redevelopment of brownfield areas is not appropriate on sites of high environmental value particularly as some sites may have an increased ecological value.	Support noted and welcomed. Sustainable development remains a key objective of the NPPF and its delivery is recognised as a key priority for the local plan.
Michael	Fearn	Shireconsulting	Barclays Bank plc	EC4	SEE FULL REP - The Council’s objectives will require major commitment and substantial investment by the private sector. Pursuing restrictive policies to keep significant generators of footfall such as the Bank out of primary shopping frontages will actively work against the achievement of those objectives and is an outdated and discredited approach. The ‘Plan for Growth’ set out the Government’s determination that planning policies and their implementation must facilitate economic investment and growth, a policy now reinforced in the NPPF. The Local Plan must therefore follow the approach set by national policy in respect of retail frontage policy by revising Policy EC4 to provide that support for investment by stakeholders such as our Client and to ensure that the local plan is sound. Arbitrary planning policies designed to restrict generators of footfall such as the Bank in	It is recognised that recent Government amendments to permitted development rights indicate a further transition towards greater flexibility of use in sustainable town centre locations. The NPPF requires that local planning authorities define the extent of primary shopping areas based on clear definition of primary and secondary frontages in designated centres, and set policies that make clear the uses that will be permitted. The NPPF requires that the primary shopping area acts as defined area where retail development is concentrated, and it will be important to ensure this objective is met through the local plan. Having regard to the direction of Government policy and local plan representations, it is recognised

Economic Growth						
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					<p>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 done, the Council will risk the DPD being found unsound. Policy wording should make it clear that uses such as shops, banks and building societies which contribute to the vitality, viability and diversity of town centres will be encouraged and that such active ground floor uses will be appropriate in primary frontages without restriction.</p>	<p>that a percentage based threshold approach to guiding change of use is no longer appropriate, particularly given the broad NPPF definition of Main Town Centre Uses. On this basis a more flexible policy approach will be progressed.</p>
Mark	Bewsey	Savills	Homes and Communities Agency	EC4	<p>Comment – In order to further improve the vitality and viability of Crawley Town Centre, it is vital that an appropriate mix of uses is encouraged. This can be partly achieved through increasing the number of people living within the town centre to ensure the area is active at all times of day. The provision of well design residential accommodation can also help to reduce anti-social behaviour through natural surveillance resulting in overlooking of</p>	<p>Noted. It is recognised that the Town Centre represents a sustainable location for residential development, and the Local Plan will seek to promote the town centre for appropriate residential uses, including the identification of under-used town centre sites for development with mixed use residential and main town centre</p>

Economic Growth						
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					public areas from windows and balconies. The HCA therefore suggests that policy EC4 should be amended to promote residential use of under-used peripheral town centre sites.	uses.
John	Lister	Natural England	0	EC4	The emphasis within policy EC4 to ensure effective use of upper floors within the town centre boundary for retail and residential use is supported by Natural England as this promotes a more sustainable use of space and helps to reduce the pressure on greenfield sites as locations for new development.	Comment noted and support welcomed.
Martyn	Chase	Stanhope plc	0	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 type will undermine the Town Centre and prejudice the ability to bring forward a comprehensive development of Town Centre North.	Support noted and welcomed. The local plan will continue to reflect the town centre first approach, and retail proposals will continue to be guided towards the most sustainable locations through application of the sequential and impact tests, having regard to information submitted by applicants and the council's own evidence base.
Alyson	Jones	Barton Willmore	SEGRO	EC5	As noted above, there is a contradiction between Policy EC5 which allows for retail development in non Town Centre locations subject to a number of tests, and Policy EC6 Manor Royal which looks to specifically restrict retail provision. Policy should be clarified to allow for larger scale retail and leisure development than that allowed under Policy EC6 at Manor Royal, provided the tests are met. This should also be clarified under Policy EC6. SEGRO considers a balanced approach needs to be taken and where proposals for other parts of the borough are brought forward by the development industry the approach of CBC, and other statutory consultees, should be supportive until it becomes clear that a	Noted. The intention of Policy EC6 Part C was to provide guidance as to an appropriate threshold of retail through which an identified qualitative and quantitative shortfall in retail provision for Manor Royal employees may be met, whilst retaining an overall employment function at Manor Royal. The figure has been identified based upon the typical unit footprint in Crawley's neighbourhood parades. It is however acknowledged that the NPPF requires that applications for main

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					proposal would not be acceptable because of consequential impacts that are deemed unacceptable. Any other approach would risk losing investment at a time where investment and jobs should be welcomed. 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.	town centre uses, which are not in a central location or in accordance with an up-to-date development plan, should be subject to sequential assessment and as appropriate, impact testing. Therefore, to help determine applications for out-of-centre retail development, the council has updated its Retail Capacity and Impact Study (2013), which provides clearly evidenced locally specific impact thresholds, as encouraged in the NPPF.
John	Lister	Natural England	0	EC5	Natural England notes the Borough's attempt to encourage retail development to be located on appropriate, central sites. Within policy EC5 it is encouraged that new retail development is situated within; <ul style="list-style-type: none"> • The primary shopping area or High Street • Appropriate sites identified under Local Plan policies EC2 and EC3 • Neighbourhood centres Where new retail is proposed in other locations it will only be permitted where; <ul style="list-style-type: none"> • The need for development cannot be met on more central sites; having applied the sequential test • The impact of the development will not undermine the vitality and viability of the town/neighbourhood centres. Natural England consider retail development to be better suited in locations where there is a choice of transport modes and other services available within close vicinity.	Noted. The approach of the local plan is to reflect the approach of the National Planning Policy Framework by seeking to guide retail development to the town centre and neighbourhood parades in the first instance. The appropriateness of non-central retail proposals will be considered having regard to sequential assessment and impact testing as per the NPPF and Local Plan.
John	Adams	Drivers Jonas Deloitte	Shearer Property	EC5 & EC6	In brief, SPG object to Policy EC6 on grounds that Criteria C contains an arbitrary definition of	Noted. The intention of Policy EC6 Part C was to provide

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			Group		<p>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 town as a whole. The test that should be applied here is whether or not the proposed retail uses would result in a shortage in supply of employment uses and indeed whether or not they would serve to restrict the operation of existing adjacent properties and / or their potential redevelopment. There is also a conflict between Policy EC5 which allows for retail development to come forward in out of centre locations provided the relevant criteria are met and Policy EC6 which provides an absolute restriction on retail in this location above a certain threshold. Policy EC6 should be amended to delete Criteria C.</p>	<p>guidance as to an appropriate threshold of retail through which an identified qualitative and quantitative shortfall in retail provision for Manor Royal employees may be met, whilst retaining an overall employment function at Manor Royal. The figure has been identified based upon the typical unit footprint in Crawley's neighbourhood parades. It is however acknowledged that the NPPF requires that applications for main town centre uses, which are not in a central location or in accordance with an up-to-date development plan, should be subject to sequential assessment and as appropriate, impact testing. Therefore, to help determine applications for out-of-centre retail development, the council has updated its Retail Capacity and Impact Study (2013), which provides clearly evidenced locally specific impact thresholds, as encouraged in the NPPF.</p>
Karen	Calkin	RPS Planning & Development	Costco Wholesale Limited	EC6	<p>SEE REP FOR MORE INFO - SEE REP FOR MORE INFO - This representation supports Policy EC6 (Manor Royal Masterplan & Spatial Strategy) which promotes Manor Royal as an economic hub and where sustainable 'economic development' will be encouraged. The policy makes reference to employment</p>	<p>Support is welcomed and noted. The Economic Growth Assessment (2013) identifies a significant demand for employment land at Crawley, and recommends that Manor Royal should be protected for business</p>

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>generating uses. For clarification it is suggested that the Plan includes a definition of Economic Development within the glossary inline with the NPPF's definition of Economic Development: "Economic Development – Development, including those within the B Classes, public and community uses and main town centre uses (but excluding housing development)" Policy EC6 also sets out a number of criteria where development proposals for the reuse and intensification of land for employment generating uses within Manor Royal will be permitted. The Council is aware that the Costco is seeking representation in the Crawley area and that Costco are specifically interested in locating on Manor Royal. This would be the first wholesale warehouse club in Crawley. Warehouse clubs are a new and emerging sector of wholesaling. In recognition, and in accordance with the NPPF paragraph 21, Crawley Borough Council should recognise this emerging sector and positively plan for it accordingly. RPS therefore requests that a new criterion is added to Policy EC6 as follows: "f) are for sui generic warehouse club provided that the sequential and impact tests of the NPPF are met."</p>	<p>use. As such, the submission local plan policy approach will seek to protect Manor Royal for B-Class business use. It is however recognised that Manor Royal is characterised by a number of other uses that fall beyond the B-Classes but within the NPPF definition of employment. As such, proposals for non-business uses that would complement and support the main business function of Manor Royal will be considered on their individual merits.</p>
Wakako	Hirose	Rapleys LLP	T&L Crawley LLP	EC6	<p>Policy EC6 encourages sustainable economic development, including "employment generating uses" in Manor Royal. However, I object to criterion c, which sets a threshold of 300sq.m of Class A1 retail floorspace that is permissible in Manor Royal, which is considered to be too prescriptive. The Local Plan should continue to adopt a flexible approach to the use/reuse of employment land for alternative uses, including retail, that provide economic growth opportunities for the</p>	<p>Noted. The intention of Policy EC6 Part C was to provide guidance as to an appropriate threshold of retail through which an identified qualitative and quantitative shortfall in retail provision for Manor Royal employees may be met, whilst retaining an overall employment function at Manor Royal. The figure has been identified based</p>

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					town. It should be noted that this is contrary to the NPPF, which requires Local Authorities to set an economic vision and strategy which positively and proactively encourages sustainable growth, through policies that are flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances. In these terms, the 300sq.m threshold should be removed and the policy should advise that retail development is permissible subject to satisfying the retail tests of the NPPF.	upon the typical unit footprint in Crawley's neighbourhood parades. It is however acknowledged that the NPPF requires that all applications for main town centre use, which are not in a central location or in accordance with an up-to-date development plan, should be subject to sequential assessment and as appropriate, impact testing. Therefore, to help determine applications for out-of-centre retail development, the council has updated its Retail Capacity and Impact Study (2013), which provides clearly evidenced locally specific impact thresholds, as encouraged in the NPPF.
Mark	Bewsey	Savills	Homes and Communities Agency	EC6	Comment – The HCA has significant landholdings on the edge of the Manor Royal Business District at Rowley Farm. This land falls within the Gatwick Safeguarding Area so is therefore currently unable to be developed. The constraints posed by the safeguarding area should be recognised within the emerging Local Plan and text within the Reasoned Justification section on page 68 be amended to: “There is no new land to allocate in the borough due to its physical constraints, compact urban area and the restrictions of the Gatwick Safeguarding Area.”	Noted. The Local Plan makes reference to the land availability constraints faced by Crawley over the plan period, though it is agreed that there is merit in identifying the Gatwick Safeguarding Area as a development land constraint.
Martyn	Chase	Stanhope plc	0	EC8	Policy EC8 steers leisure uses to Crawley Leisure Park, The Hawth and K2. We consider that (as recognised in the reference to the NPPF) town centre sites should also be considered prior to out of centre locations, in	Agree. It is recognised that Town Centre sites are sequentially preferable leisure locations, in addition to the specific areas identified in the plan. Policy has

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					order to help create and enhance a family orientated leisure and evening economy.	been amended to identify the town centre as an appropriate leisure location, in addition to the established non-central location leisure locations identified in the policy.
Peter	French	WYG Environment Planning Transport Ltd.	Sainsbury's Supermarkets Ltd.	Sainsbury's Supermarkets Ltd.	Whilst Sainsbury's encourages the development of both town centre and edge of centre sites in order for Crawley to enhance its role as a Primary Regional Centre, part of the wording of Policy EC3 'Town Centre and Edge-of-Centre Development Sites' is contrary to the requirements of both the National Planning Policy Framework (NPPF) and the practice guidance of Planning Policy Statement 4 (which remains valid guidance). The fourth paragraph of Policy EC3 as currently proposed reads as follows: "Developments on edge-of-centre sites should not contain any material net gains in retail floorspace unless specifically identified. Further guidance on the Council's aspirations for each of the above sites will be set out in separate development principles statements." The NPPF states at paragraph 24 that 'Local Planning Authorities should apply a sequential test to planning applications for main town centre uses that are not in an existing centre and are not in accordance with an up-to-date Local Plan. They should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be considered. When considering edge of centre and out of centre proposals, preference should be given to accessible sites that are well connected to the town centre. Applicants and local planning authorities should demonstrate	Noted. It is acknowledged that there apparent duplication and potential inconsistency between the wording of Policy EC3 (fourth paragraph) and Policy EC5. The National Planning Policy Framework outlines that applications for main town centre uses which are proposed outside of existing centres and are not in accordance with an up-to-date local plan should be subject to assessment through the sequential test and as appropriate, impact assessment. This approach is recognised through the updated local plan retail policies, which have been amended for consistency with the NPPF and other policies in the submission local plan.

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>flexibility on issues such as format and scale'.The NPPF makes it clear that no development proposing main town centre uses should be prejudiced in edge or out of centre locations – including retail – provided that the sequential approach is satisfied, and provided the proposals would not have a significantly adverse impact on the vitality and viability of protected retail centres. Therefore, rather than stating that there should be no net gains of retail floorspace in edge-of-centre sites, the policy should reflect the wording contained within the proposed policy EC5 'Non-Central Retail Development'. This requires applicants to demonstrate that the need for the development cannot be met on more central sites, having applied the sequential test, and also show that the impact 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</p>	

Economic Growth						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					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 allocated development sites may not be available in the short to medium term.	
0	0	Crawley Young Persons Council	0		Better town centre?· 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?	The Town Centre North proposal could introduce restaurants into a new Boulevard, potentially supported by leisure uses such as a cinema at first floor level and some flats. This would create more evening activity that could spread into Queens Square. More activity and natural surveillance, supported by the Police and CCTV, would increase the sense of security. Away from the Town Centre North proposals, emerging local plan policies will seek to provide greater policy flexibility to encourage a range of appropriate town centre uses, whilst maintaining a strong retail-focussed primary shopping area.
0	0	Crawley Young Persons Council	0		Do you see yourself living in Crawley in the next 10 years?· Many members felt they wouldn't want to live in Crawley after finding a job·Argued that there are better job opportunities in big cities such a London.	Noted. Although it acknowledged that larger settlements will tend to offer a more diverse range of employment opportunities, a key objective of the local plan will be to continue promoting Crawley as an employment hub in order to ensure that the right job opportunities are available to Crawley residents and people

Economic Growth						
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						living in the wider sub region. Likewise, the plan will seek to ensure that sufficient housing provision is in place to cater for future need.
Andy	Evans	Miller Homes	0		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 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.	The Preferred Strategy Local Plan has been developed having regard to the Northern West Sussex Employment Land Review (ELR) 2009/10, and the emerging policy approach has been drafted based on this evidence base. The local authorities is now undertaking the Northern West Sussex Economic Growth Assessment (2013). This identifies significant demand for employment floorspace over the plan period, and has informed the approach of a revised Submission Local Plan Policy EC1 (Sustainable Economic Growth). The policy provides a strategic level view of employment requirements within the borough, and details the council's approach for meeting this demand.
Martyn	Chase	Stanhope plc	0		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	Support is noted and welcomed. The local plan will reflect the overarching NPPF objective to deliver sustainable economic growth, and a key aspect of this will be to support and enhance the vitality and viability of the town

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					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.	centre through TCN. Any non-central retail development proposals will be considered in light of the national policy objective to promote sustainable town centre development and application of the sequential and impact assessments, having regard to any information submitted by applicants and the council's own retail evidence base.
Martyn	Chase	Stanhope plc	0		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. To this effect we would also like to see the boundary of Town Centre North in the Proposals Map to include 2-16 The Boulevard and 4 – 12 The Broadway as this will be an important gateway into the new scheme from the High Street and the existing Broadway.	It is recognised that delivery of Town Centre North will impact on retail circuits and pedestrian flows, potentially increasing the profile of The Broadway as a retail destination. Frontage designations proposed through the local plan may need to be reviewed once the core retail phase of TCN has commenced. Given the emerging proposals for the TCN scheme, focussing retail at the western end of the Boulevard, it is appropriate to consider extending the TCN allocation boundary to include 2 - 16 The Boulevard and 4 - 12 The Broadway. If accepted by the Inspector, the amended boundary will be reflected in a revision of the TCN SPD.
Wakako	Hirose	Rapleys LLP	T&L Crawley LLP		In summary, I consider that the Local Plan should continue to protect the existing employment land, in select locations, where there is an identified need. This should not, however, be at the expense of adopting a more	Noted. It is recognised that employment policies should reflect requirements of the NPPF, and draft policy wording will be revisited and as appropriate

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					flexible approach elsewhere. The Local Plan needs to positively respond to changing economic circumstances, when considering appropriate alternative uses, which contribute to Crawley's economic growth. As part of this process, my client's site should be allocated for retail use.	amended to reflect this. It is recognised that development has commenced at the Betts Way site, and it is as such considered unnecessary to formally allocate this out-of-centre location for retail development.
Brenda	Burgess	0	0		Fewer office blocks unless we know they are going to be occupied.	Noted. The local plan evidence base is exploring the demand for town centre office floor space, and will consider whether it may be appropriate to consider other uses in these locations. It is noted that the Government's proposed amendments to permitted development rights will allow a change of use from office to residential use in areas which are not subject to exemption.
Sally	Stallan	Horsham District Council	0		In terms of economic growth, we see that you are focussing future development on Manor Royal, Three Bridges employment corridor and Maidenbower Business Park, all of which are existing employment sites, with the aim to improving them. We note that you are not seeking to allocate any additional sites for employment use. We also note the policy approach to office use – directing this out of the town centre to Manor Royal, which although is contrary to the guidance contained within the National Planning Policy Framework; we note that there is local justification for this approach.	Support noted and welcomed. A key objective of the local plan is to enhance the diverse employment offer of the town and promote Crawley's role as a sub-regional centre for economic development. The North West Sussex Economic Growth Assessment (2013) being progressed on a joint working basis, has identified a significant demand for employment floorspace over the plan period, that currently exceeds Crawley's available land supply. The local plan seeks to direct business use to the Main Employment Areas, promoting the intensification and improvement of existing employment sites. It is however

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						recognised that a new strategic employment location may need to be identified during the plan period to accommodate the identified growth, and the Submission Local Plan sets out a commitment to further explore the need and scope for additional employment once there is certainty as to the land supply position regarding Gatwick Airport safeguarding.
Sally	Stallan	Horsham District Council	0		We note that an objective of the plan is to reinforce Crawley's role as a competitive regional shopping centre. To achieve this, the strategy seeks to deliver a step change in retail development to enhance the town centre. Whilst we recognise the growth may be needed to ensure Crawley maintains that regional status, this should be planned in a complementary manner to the role that other town centres in the region perform. This is recognised in the introduction of the document with reference to the Gatwick Diamond Local Strategic Statement. We welcome ongoing discussions about the complementary and supportive role of Horsham town centre but suggest this could be mentioned in the main body of the strategy.	Noted. The council is committed to working alongside all of its neighbouring authorities as the local plan comes forward. The recent update of Crawley's Retail Capacity and Impact Study (2013) has found there to be sufficient comparison goods expenditure available to support the scale of new retail development now emerging for Town Centre North, with only modest and (we believe) achievable increases in market share of catchment area expenditure attracted by Crawley Town Centre. This means that such a development will be very unlikely to have any significant adverse impacts on the town centres in surrounding towns. It also means that for the purposes of plan preparation there is no need to undertake detailed testing of the likely impact upon surrounding town centres of the scheme now emerging at Town

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						Centre North, as the impact of a much larger scheme has been fully tested in the RCIS, and found to be insignificant.
Tim		Savills	Wilky Group		A strategic employment allocation at Gatwick Green would achieve a high degree of consistency with local, sub-regional and regional policy. The development would promote and fulfil all relevant important economic development objectives whilst responding to local requirements with respect to employment, health and education, transport provision and sustainable development. Significantly, Gatwick Green is uniquely well placed to deliver the range of aspirations set out in the Gatwick Diamond Futures Plan. ⁸⁶ The draft Local Plan does not address either strategic or location specific proposals for a high quality B1 business hub and innovation park along the lines proposed at Gatwick Green, either as a concept or locationally at Gatwick Green. Without such provision, the plan is considered unsound.	Noted. The Preferred Strategy Local Plan has been developed having regard to the Northern West Sussex Employment Land Review (ELR) 2009/10, and the policy approach has been drafted based on the available evidence base. The council has now updated its economic evidence base by way of the Economic Growth Assessment (2013), undertaken on a joint-working basis with Horsham and Mid Sussex District Councils. The EGA identifies a qualitative and quantitative need for additional business floorspace at Crawley. To help meet this need, the council is seeking to direct business to the existing main employment areas. It is recognised that there may be need for additional employment land at Crawley during the course of the plan period, though certainty as to the future of status of Gatwick safeguarded will be needed before options can be explored in full. This position is therefore reflected in the approach of the Submission Local Plan.
Elizabeth	Burt	Savills	Crest Strategic		CSP supports the Council's aim for Crawley to continue to be an economic leader with the	Noted and Agreed. The council is currently undertaking a revision of

Economic Growth						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
			Projects		provision of a business environment that supports and encourages new and established businesses to grow. It must however be recognised that this will need to be supported by the required number and mix of housing to ensure a balanced and successful economy can be achieved and sustained.	its Locally Generated Housing Needs Assessment to take account of updated census data and new household projections. To accurately identify housing need over the plan period, the Housing Needs Assessment will therefore factor into its forecasts the total number of jobs created under any scenarios identified in the Economic Growth Assessment.
Alyson	Jones	Barton Willmore	SEGRO		The Preferred Strategy consultation document primarily deals with Manor Royal within the Economic Chapter (page 55 onwards) where Manor Royal is referred to a 'A premier mixed-use location for business'. The estate is confirmed as the key employment location to serve Crawley and the wider area, whilst acknowledging that there is a case, including responding to market demand, for other uses to be allowed, so long as it is at a scale ancillary to the traditional Class B employment business function of the business estate. SEGRO do not support this approach which is considered likely to stifle development and be counter-productive over the medium term, as set out below.	Noted. The NPPF is clear that the planning system should support and drive economic development, with Paragraph 20 in particular requiring local planning authorities to plan positively in meeting the needs of business. The Economic Growth Assessment (2013) identifies a significant demand for employment floorspace over the plan period, and has outlined that in light of Crawley's limited employment land supply, Manor Royal should be protected as a destination for business uses. It is recognised that other employment generating uses may be appropriate where these would support the core business function at Manor Royal, and the Submission Local Plan policy approach provides some flexibility to assess proposals for other economic development use where these would support the overall business role and function of

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						Manor Royal.
Alyson	Jones	Barton Willmore	SEGRO		Key Diagram. It is not considered appropriate to include the Manor Royal Gateway Sites on the key diagram given that the diagram, in all other respects, only includes very high level broad areas of land uses. It would be more appropriate for the Manor Royal Gateway Sites to be included on the Northgate Neighbourhood Plan (page 175) (it would also be helpful if the Neighbourhood plans could have titles for ease of reference) or the Proposals Map. The status of the Key Diagram is not clear as there is no definition or cross-referencing of either the Key Diagram or the Proposals Map.	Noted. Reference to the Gateway Sites is removed from the key diagram, and is set out in more detail within the Manor Royal Design Guide SPD.
Alyson	Jones	Barton Willmore	SEGRO		Proposals Map It is not clear from the list of contents that the Proposals Map is part of the Local Plan document and there is no definition as to its status within the Local Plan draft document.	The Proposals Map will reflect the policies set out in the Local Plan.
John	Lister	Natural England	0		• Manor Royal is the largest business area in the town. We should encourage the area to remain a business district? It is not within Natural England's remit to comment on this	Noted.
John	Lister	Natural England	0		• 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? Main roads and gateways into Manor Royal or; Everywhere within Manor Royal Natural	Support noted and welcomed.

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					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.	
John	Lister	Natural England	0		<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>	Noted. The town centre is a sustainable development location and benefits from good links by sustainable modes of transport.
John	Lister	Natural England	0		<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>	Support noted and welcomed.
John	Lister	Natural England			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 It is not within Natural England's remit to comment on this	Noted.

Housing						
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David	Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	CH6	It is important that Policy H3 and the supportive test allow such matters to be market driven and subject to viability where open market housing is concerned. Whilst the SHMA provides evidence of demand it should not be used to dictate the mix that must be delivered on all sites.	The Council would agree that the application of housing mix to meet housing needs (as Evidenced by the SHMA 2012 update), namely two and three bedroom dwellings, should only be in relation to the affordable component of any housing development. The Council would not seek to dictate the mix of housing which should be provided in the market element of any development.
Andy	Evans	Miller Homes	0	H1	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	Comment noted. Whilst the need to provide approximately 8,100 dwellings over the 15 year plan period is required in order to meet the demographic needs of the population, there is not sufficient land within Crawley to provide for this number of new dwellings. The Council is actively trying to overcome existing constraints to development and will consider any sites proposed through the Preferred Strategy consultation, including the land east of Brighton Road, in order to maximise the amount of new housing which is planned for over the plan period, however, it is unlikely that this will greatly increase capacity towards provision of 8,100 dwellings (540 pa). In order for the Local Plan to be found sound, the Borough will need to demonstrate evidence of effective cooperation with adjoining local authorities in order that its housing needs can be accommodated

Housing						
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					elsewhere. Without both elements of such evidence, the plan is likely to be found unsound.	across the wider housing market area.
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'. 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> <p>Secondly, in the face of failing to meet its housing needs the consultation document proposes at Policy CH6 to not review any of the Council's existing design standards for housing development. What the standards are is critical to</p>	<p>Comments noted. Paragraphs 47 and 182 of the NPPF identifies that local planning authorities should use their evidence base to meet objectively assessed housing needs in full. The Local Plan recognises this requirement and identifies a series of housing numbers according to a range of demographic, economic and housing scenarios. These range from 120 dwellings per annum under a static employment scenario to 664 dwellings per annum based upon the continuation of short term migration trends. The baseline demographic scenario would require 542 dwellings to be built each year over the plan period. The Local Plan identifies that the constrained nature of land supply in Crawley means that it will not be possible to meet objectively assessed needs in full and that a large proportion of the borough's demographic housing needs over the next 15 years cannot be met within the borough boundaries and will therefore need to be met across the wider housing market area. Paragraph 179 of the NPPF identifies that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas due to a lack of physical</p>

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					the delivery of the housing requirement, particularly the Council's garden size standards, which are critically in need of review. The Council must give proper consideration to the impact of retaining the minimum space standards and garden sizes on the delivery of development, as well as development viability. Over-onerous garden standards artificially constrain the mix of development on a site, compromise urban design and increase new-build house prices in the Borough. Crucially they also constrain the number of units which can be delivered from sites. In this context it is considered that the Council could actually deliver more dwellings from its identified Policy H2 sites, were the garden size standards reviewed to encourage the sorts of design approaches encouraged in national planning and design guidance.	capacity. Crawley Borough Council is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is on this basis, that the Local Plan seeks to be compliant with the requirements of the NPPF and therefore sound. The Council's external space standards generally relate to private rear gardens and do not unduly restrict the form of development on the site frontage, allowing the character of the public realm to be varied.
Cath	Rose	Reigate & Banstead Borough Council	0	H1	<p>We note that the level of constraint within Crawley Borough has prompted the Council to adopt a supply-led approach to setting a housing target, which is lower than figures in the South East Plan and lower than the borough's predicted demographic housing needs. We would expect CBC, through its site allocations work, to take a proactive approach to maximise housing provision within its own area. This should be based on a robust and comprehensive analysis of land supply opportunities. It may also be helpful to include a housing target in the final housing provision policy.</p> <p>RBBC is committed to continued cross boundary co-operation to plan for strategic development needs, including housing. This ongoing work will not only need to take account of the level of constraint in Crawley, but also in neighbouring authorities including Reigate & Banstead.</p>	Comments noted. Crawley Borough Council will continue to undertake a proactive approach to maximising housing opportunities within its administrative boundaries in order to meet its predicted demographic housing needs. The Council welcomes Reigate and Banstead Borough Council's proactive approach to maximising opportunities for residential development within the borough and their cooperation in meeting strategic development needs across the wider housing market area including Sustainable Urban Extensions in the southern part of the Borough.

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					<p>We are a highly constrained borough, with 70% of our total area covered by Green Belt designation, a range of other landscape and nature conservation designations including the Surrey Hills Area of Outstanding Natural Beauty and the Mole Gap to Reigate Escarpment Special Area of Conservation, and severe flood constraints in the small (non-urban) part of the borough that is not designated as Green Belt. Despite this the Council is taking a proactive approach to planning for housing in line with the South East Plan, to meet the housing needs generated by our own population and accommodate some in-migration from neighbouring authorities. The Council has recognised that difficult decisions need to be taken in relation to future housing provision in the borough, including the release of Green Belt land. Even so, our latest evidence highlights the very limited opportunities for sustainable development that exist in the borough (see our Sustainable Urban Extensions: Broad Geographic Locations Technical Paper November 2012).</p> <p>In the parts of our borough closest to Crawley, we are progressing with plans to deliver two new neighbourhoods in providing a total of 2,200 homes. Our recently completed work in relation to opportunities for further urban extensions identifies the extensive nature of constraints around Horley which limit the town's capacity to accommodate further growth. However, this work does also recognise that there may be additional opportunities for further small scale growth in this area, which we are committed to exploring further as we develop our Development Management Policies (including site allocations) document.</p>	
Jack	Straw	Mole Valley	0	H1	5. However, we feel we must raise some concerns	Comments noted. Paragraphs 47

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		District Council			<p>about the housing figure being proposed in the Crawley Preferred Strategy. Both the Development Strategy & Strategic Policies section and the Housing section of the Strategy report the results of the Locally Generated Housing Needs Assessment and the need for around 542 homes per annum.</p> <p>6. Notwithstanding this evidence, only just under half of that is being planned for. The Strategy does not seem to have followed the advice in paragraph 179 of the NPPF, to ensure that development needs which cannot wholly be met within the area of the plan making authority are addressed through local planning authorities working together. Therefore the question has to be asked; where is the housing that is required to accommodate the needs of Crawley's growing population going to go? How is it being planned for? And what certainty is there that this can be delivered? Does this take into account migration from other areas such as Mole Valley?</p> <p>7. We are very concerned that this level of 'under-provision' could have knock-on effects for the amount of new housing to be provided elsewhere in the sub region/ housing market area.</p>	<p>and 182 of the NPPF identifies that local planning authorities should use their evidence base to meet objectively assessed housing needs in full. The Local Plan identifies that the constrained nature of land supply in Crawley means that it will not be possible to fully meet objectively assessed needs and that a large proportion of the borough's demographic housing needs over the next 15 years cannot be met within the borough boundaries and will therefore need to be met across the wider housing market area. Paragraph 179 of the NPPF identifies that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas due to a lack of physical capacity. Crawley Borough Council is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is hoped that broad agreement on housing numbers across the Housing Market Area can be reached through the 'duty to co-operate' requirement in respect of strategic priorities and it is on this basis, that the Local Plan seeks to be compliant with the requirements</p>

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						of the NPPF (para 178 and 182) and therefore sound. Both the amount and location of new housing outside of Council's administrative boundary to meet Crawley's demographic housing needs remains unknown at this stage and it is this work which is required to enable agreement on housing numbers across the Gatwick Diamond area.
Steve	Tremlett	Brighton & Hove City Council	0	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>	<p>Crawley recognises its responsibilities to meet as much of its emerging objectively assessed housing need within its own borough. However, it has very real constraints which limit the land supply available for achieving this in its entirety. As part of this work Crawley has commissioned further updated studies into open space and employment land to ensure they are NPPF compliant. Any further sites for allocation will be considered in an additional stage of preferred strategy sites specific consultation. It is not anticipated these will meet Crawley's unmet needs in full. It is therefore appropriate for Crawley to continue discussions across its wider HMA, in accordance with NPPF paras, 159, 178 – 182.</p> <p>The relationship across the northern West Sussex Housing Market Area (HMA) is well recognised and based on clear evidence illustrating the strong links across the area. Whilst the overlaps between the local HMA's are acknowledged, including</p>

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						<p>the inter-relationship between, particularly Mid Sussex and Brighton and Hove and the extent of the travel to work area up to Crawley, due to the location of the South Downs National Park it is also recognised that Brighton's strongest links across a local HMA is with the Coastal Sussex authority area.</p> <p>Crawley welcomes the opportunity to be involved in wider HMA discussions which may involve the other Gatwick Diamond (Surrey) authorities and the Coastal Sussex authorities (including Brighton and Hove, Lewes District and the South Downs National Park) in recognition of the wider strategic implications of housing delivery and meeting housing needs, and seek to support the longer term strategic sustainable development solutions.</p>
Iain	Painting	Barton Willmore	Bellway Homes Ltd, Devine Homes PLC and Reside Developments Ltd.	H1	SEE FULL REP FOR MORE - "...Regardless as to whether the identified strategic requirement is correct, the council acknowledges that the 3543 requirements set out in H1 will 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..."	Comments noted. Paragraphs 47 and 182 of the NPPF identifies that local planning authorities should use their evidence base to meet objectively assessed housing needs in full. The Local Plan identifies that the constrained nature of land supply in Crawley means that it will not be possible to fully meet objectively assessed needs and that a large proportion of the borough's demographic housing needs over the next 15 years cannot be met within the borough boundaries and will therefore need to be met across the wider housing market area.

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						Paragraph 179 of the NPPF identifies that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas due to a lack of physical capacity. Crawley Borough Council is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is intended that broad agreement on housing numbers across the Housing Market Area can be reached through the 'duty to co-operate' requirement in respect of strategic priorities and it is on this basis, that the Local Plan seeks to be positively prepared and compliant with the requirements of the NPPF (para 178 and 182) and therefore sound. Both the amount and location of new housing outside of Council's administrative boundary to meet Crawley's demographic housing needs remains unknown at this stage and it is this work which is required to enable agreement on housing numbers across the Gatwick Diamond area.
Mark	Bewsey	Savills	Homes and Communities Agency	H1	Object – Policy H1 makes provision for the development of 3,543 net dwellings in the borough for the period 2014-2029. This equates to an	Comment noted. Whilst the need to provide approximately 8,100 dwellings over the 15 year plan

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					average of 236 dwellings per annum. This is significantly below the South East Plan requirement of providing a minimum of 375 homes every year (South East Plan policy H1). ...SEE FULL REP FOR MORE	period is required in order to meet the demographic needs of the population, there is not sufficient land within Crawley to provide for this number of new dwellings. The Council is actively trying to overcome existing constraints to development and will consider any sites proposed through the Preferred Strategy consultation, including appropriate HCA land in order to maximise the amount of new housing which is planned for over the plan period, however, it is unlikely that this will greatly increase capacity towards provision of 8,100 dwellings (540 pa). In order for the Local Plan to be found sound, the Borough will need to demonstrate evidence of effective cooperation with adjoining local authorities in order that its housing needs can be accommodated across the wider housing market area.
Michael	Simknins	Michael Simkins LLP	Private Landowner	H1	<p>The Housing Chapter of the draft Local Plan sets out the evidence base that has been prepared to underpin the emerging Local Plan, and in particular, the various scenarios and annual housing requirement identified within the Locally Generated Housing Needs Assessment.</p> <p>As set out by the Borough Council within the Draft Chapter, the NPPF places a requirement on the Local Planning Authority to prepare a Plan that meets the objectively assessed housing needs and positively seek opportunities to meet those needs of the area during the Plan Period (Para 14). Coupled with the need to maintain a rolling</p>	Comments noted. The council fully understands the need to provide for objectively assessed housing needs in the Housing Market Area in accordance with paragraph 47 of the NPPF, which in the case of Crawley, represents the North West Sussex Housing Market Area and extends beyond the Council's administrative boundaries into Mid Sussex, Horsham and Reigate and Banstead. Given the council is to be adopting a supply-led approach to housing provision, providing for

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					<p>supply of deliverable sites the equivalent of 5 years (plus 5%), the level of annual housing delivery will be principal element of the soundness of the Local Plan at Examination.</p> <p>We raise concern at this time that while the Council has commissioned the evidence base and set out the various scenarios for housing need and demand, it has chosen within Policy H1 to adopt a level of growth based on an assumed level of housing supply, and not as contained within the NPPF, based on the objectively assessed housing needs. This approach could result in the Local Plan being deemed unsound.</p> <p>A similar approach was recently taken by Suffolk Coastal District Council in preparing its Core Strategy, which was submitted for Examination in early 2012. In 6th June 2012, the appointed Inspector wrote to the Council to clarify precisely what figure the Council considered to be its 'objectively assessed housing needs', as its primary housing policy and resulting annual requirement were inconsistent with the evidence base and Locally Generated Housing Needs Study. As per Crawley Borough, the Council had opted for basing its housing targets on an assumed level of supply as opposed to housing need.</p> <p>The Inspector highlighted that capacity for new housing was a different concept to housing need and that it would be for the Council to demonstrate that a housing provision that falls short of meeting those needs is justified. As per the requirements of the NPPF, the Inspector could not allow the Core Strategy Examination to proceed without at least an acknowledgement of what the Council considered to be the objectively assessed needs.</p>	<p>3,543 net dwellings over the plan period based on identified supply (240 dwellings per annum), it is acknowledged that a significant proportion of the Borough's objectively assessed housing need will not be met within the plan period. However, the council will seek to ensure through cross boundary working with adjoining authorities, that any unmet housing need is capable of being accommodated across the wider Housing Market Area in accordance with the Gatwick Diamond Local Strategic Statement and associated Memorandum of Understanding. It is on this basis, that the council's approach to addressing objectively assessed housing needs will be considered sound.</p>

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					<p>As drafted, Crawley Borough's Local Plan does not clarify what it considers to be the 'objectively assessed housing needs'; but instead provides within Table 1 the variations based on a number of scenarios. This we suggest will need to be refined and the Council place within the next iteration 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).</p> <p>Based on a continuation of the existing demographic patterns, the Council has identified that this would mean the housing requirement equalling 542 dwellings per annum in the period 2010 to 2031, or 11,382 in total. With 384 dwellings completed in 2010/2011, the residual annual requirement will have risen to 550 dwellings per annum at March 2011 and will continue to rise should the 2011/2012 net completion figures record a level below this figure.</p> <p>By way of comparison, Policy H1 of the draft Local Plan seeks delivery of 3,543 dwellings over a 15 year Plan period, which would equate to 236 dwellings per annum, with an assumed level of windfall to apply beyond that. The figure of 3,543 is that contained within the Council's most recent SHLAA and its supply led approach to the Policy is set out within the 'Reasoned Justification' Section (Page 80).</p> <p>In short, this level of housing delivery would represent only 42% of the identified housing need for the 15 year Plan Period when based on a continuation of current demographic change. This</p>	

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					<p>is a significant shortfall in housing supply when compared against the identified demand and need for housing within the Borough. Moreover, with a supply led housing figure, there is no annual requirement of housing need against which the Council will be judged in respect of its 5 year land supply requirement, which is a principal component of the NPPF.</p> <p>While the Council will want to seek a 'supply-led' approach to defining its housing requirement, it will as an Authority need to set out what it considers the objectively assessed housing needs to be for the Plan Period and how it considers it cannot meet those requirements due to physical or environmental constraints.</p>	
Ian	Miller	Tinsley Lane Residents Association	0	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 have</p>	<p>Comment regarding dialogue/future of Oakwood Football Club noted. The Council is currently in dialogue with the landowner (Homes and Communities Agency) to establish whether part of the land owned by the HCA could be brought forward for housing development in tandem with the existing and future requirements of the football club. An appropriate layout including housing mix has not been considered at this stage, given the early stage of discussions with the landowner, however, any residential development would need to take reference from the existing character of Tinsley Lane.</p>

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					<p>been identified as having development potential.</p> <p>Oakwood F.C. has several boys and girls football teams covering all age groups and provides an extremely valuable service in developing our young people but it needs more funding to bring its facilities up to modern standards. This was discussed with the previous owner, English Partnerships, and a draft development plan was proposed in 2003 to build houses on the north sports field while maintaining the southern half for recreation. This plan was however not considered to be viable at the time.</p> <p>Ideally these sports fields could be retained for recreation with enhanced facilities at Oakwood F.C. to include an open play area for children of residents. If this is not possible then a sustainable low density development project could be economically viable if a commuted payment from the development could be allocated to redevelop the Oakwood F. C. facilities in recognition of the contribution they make to the youth of the Borough. A low density would be necessary to avoid overloading the drainage and sewerage systems which are already close to capacity and the only practical traffic access would not be able to cope with any increase in usage without considerable adverse effect on existing properties.</p> <p>As the LDF has identified a shortage of skilled labour and of family homes this small site could be allocated for low level aspirational housing which respects the character of the surrounding area and minimises the impact on the adjacent bungalows.</p> <p>The proximity of the Manor Royal Business District makes it ideal to attract skilled workers and a safe walking distance to Hazelwick School makes the</p>	

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					site ideal for family housing. 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.	
James	Stevens	Home Builders Federation Ltd	0	H2	SEE FULL REP. "It is unclear why the housing requirement of 3,543 net dwellings over the plan period has been chosen by the Borough as an appropriate figure (see Policy H1: Housing Provision) as this does not correspond to any of the scenarios that have been outlined..." in the Locally Generated Housing Needs Assessment.	The Housing Chapter of the Local Plan explains why a housing requirement of 3,543 has been identified, based upon identified housing supply at 30 June 2012 (See Policy H1 and supporting Reasoned Justification). The nine housing scenarios identified in the Locally Generated Housing Needs Assessment (Nov 2011) provide an indication of housing requirements according to the particular scenario applied and do not consider land supply factors, in other words, the capacity of the Borough to deliver any of these scenarios. In order for the Local Plan to be found sound, it must be capable of demonstrating that it can deliver the chosen housing requirement over the plan period, as evidenced by a supporting housing trajectory. This is why the Preferred Strategy Local Plan has identified a figure of 3,543 dwellings because it is a figure which is capable of being delivered based on current supply.
Martyn	Chase	Stanhope plc	0	H2	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.	Comment noted.

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Kerry	Pfleger	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.	Comment noted. Any capacity figure identified in Policy H2 will be re-evaluated prior to the Submission Local Plan with a view to identifying a realistic indication of the capacity of each housing site.
Peter	Mason	Tandridge District Council	0	H2	<p>As regards the North East Sector, which will be a new neighbourhood located to the north of Pound Hill, the District Council has a concern relating to the northern boundary. Having the northern boundary further to the south would help to lessen the impact of the proposed development on Tandridge District which is situated to the north east of this key housing site.</p> <p>The District Council has concerns based on strategic movement policy grounds. As far as the Council is aware, it still has not been demonstrated that the proposed development is compatible with the transport infrastructure and environmental character in the area, having regard to the likely level of traffic generation from the site and the adequate availability of alternative transport modes.</p> <p>The proposed development will have a significant cross boundary impact on roads in the District in the vicinity of 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</p>	The transport and infrastructure requirements of the North East Sector were considered as part of the appeal into the planning application. Further details of will be submitted as part of the planning conditions relating to the north east sector.

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					<p>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>	
Mark	Bewsey	Savills	Homes and Communities Agency	H2	<p>Comment – In accordance with the comments on draft policy H1, and the site specific representation made by the HCA, the Land East of Tinsley Lane should be added to policy H2 as an additional housing site.</p> <p>The HCA also suggests that it would be good practice to list the SHLAA sites considered to be suitable and deliverable so that there is no ambiguity in regard to the smaller allocated sites. In this regard the HCA wish the Kilnmead site, which is clearly suitable and deliverable, to be included as a housing site.</p>	<p>Comment noted. Whilst the need to provide approximately 8,100 dwellings over the 15 year plan period is required in order to meet the demographic needs of the population, there is not sufficient land within Crawley to provide for this number of new dwellings. The Council is actively trying to overcome existing constraints to development and will consider any sites proposed through the Preferred Strategy consultation, including land at Tinsley Lane and Kilnmead in order to maximise the amount of new housing which is planned for over the plan period, however, it is unlikely that this will greatly increase capacity towards provision of 8,100 dwellings (540 pa). In order for the Local Plan to be found sound, the Borough will still need to demonstrate evidence of effective cooperation with adjoining local authorities in order that its</p>

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						housing needs can be accommodated across the wider housing market area. Any sites which are considered suitable and deliverable/developable will be identified as such in the updated SHLAA to support the Council's land supply position in the Submission Local Plan.
Michael	Simkins	Michael Simkins LLP	Private Landowner	H2	<p>The Council has identified within Policy H2 those sites it considers to be critical to the delivery of the housing strategy over the course of the plan period. The principal site is of course the consented scheme at the North East Sector, Pound Hill, which accounts for 1,900 of the total 3,543 dwellings set out within Policy H1. It is noted however that the Council has also identified additional residual land at the North East Sector for future housing growth, which accounts for a further 100 units.</p> <p>As set out within the accompanying Promotional Document, the land subject to this representation is also included within the current Core Strategy allocation for the North East Sector. While the land was not included previously within the planning application submission, it 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</p>	<p>Comments noted. This land will be assessed in terms of its potential for housing development in conjunction with the North East Sector permitted neighbourhood. At this stage, the Council have identified a number of issues that would need to be considered including potential access and impact on locally listed buildings and ancient woodland, relocation of existing power lines, the need for buffer planting and impact on trees and biodiversity. The principle of the site being considered suitable for residential development will also need to be carefully considered given that the site would only be considered appropriate in tandem with the development of a new neighbourhood. The Council will arrange a meeting with the landowner/agent to discuss the suitability of the site for housing development and its potential contribution towards housing land supply.</p>

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					Policy H2 should be amended to include this additional residual area and the capacity added to the overall target within Policy H1.	
Sarah	Harrison	Southern Water	0	H2	<p>We have assessed all of the domestic sites in Policy H2, with respect to water supply capacity and water supply infrastructure crossing the sites. Where sites are mixed-use the capacity assessment relates to the domestic aspect of the site only. We are unable to carry out capacity checks for the non-domestic sites as the anticipated flows to such sites are unknown.</p> <p>I have also attached a spreadsheet summarising the results of these checks and giving additional information where appropriate.</p> <p>In relation to the spreadsheet please note:</p> <ul style="list-style-type: none"> o Where existing capacity is currently available, it is not possible to guarantee future reservation of this capacity. o Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. o Where infrastructure crosses the site, development design should avoid building over existing infrastructure. <p>It is important that the following issues are reflected in policy text.</p>	Comments noted. IN1 of the Local Plan will ensure that new developments will meet their own infrastructure needs. However, specific housing sites will be considered at the planning application stage.
James	Stevens	Home Builders Federation Ltd	0	H4	<p>I have been unable to locate a Local Plan Viability Assessment that considers whether the proposed policy rate of 40% affordable housing, and other policies in the plan, can be achieved, without impacting upon viability and therefore the delivery of the plan. Preparing a viability assessment is required by the Framework (paragraphs 173-177). If you would like me to meet with the Council to provide some assistance on this question I am</p>	Comment noted. The Council commissioned viability work in February 2013 to ascertain the percentage of affordable housing which could be provided on development sites within Crawley according to the size and category of site. The results of this work will be reported to the Council in July

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					happy to help.	2013 and will inform the subsequent drafting of the Affordable Housing Policy of the Submission Local Plan.
Michael	Simkins	Michael Simkins LLP	Private Landowner	H4	<p>It is noted that the Council has put forward a number of Options for consideration within the Consultation Draft. A general observation is made in respect of all of the options however, which relates to the terminology used within the Policy wording.</p> <p>As drafted, the opening line of the Policy 'will require' a specific percentage, which is then amended to 'target' later within the Policy. This precise issue was debated at the South Wiltshire Core Strategy Examination, where the Inspector concluded within his Report that:</p> <p>To an extent the policy as drafted provides such flexibility with the statement in its sixth clause that the provision of affordable housing will be negotiated on a site by site basis taking into account the viability of the site. However, this is undercut by the first two clauses of the policy which lay down specific affordable housing requirements. It is the use of the word 'requirement' that causes concern as it carries with it the meaning that the specified levels of affordable housing will be demanded or imposed. Such ambiguity renders the policy ineffective and hence unsound. In order to make the CS sound the word 'requirement' should be replaced with the word 'target' IC/2 (Para 51 to 53, South Wiltshire Core Strategy Inspector's Report, September 2011).</p> <p>We consider that such ambiguity in the current drafting of Policy H4 could also be removed, without prejudicing the Council's objectives to</p>	Comment noted. The detailed wording of the affordable housing policy will be given further consideration as the affordable housing policy is developed in terms of the appropriateness of the word 'requirement' or 'target' in applying the policy. This will be given further consideration to ensure that the correct approach is identified (and can be justified) in the Submission Local Plan.

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					deliver affordable housing within the Borough by replacing the word requirement with the word target within the first sentence.	
Jack	Straw	Mole Valley District Council	0	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.	Comment noted. The Council will be undertaking a Gypsy, Traveller and Travelling Showpeople (GTTS) Needs Assessment in the spring of 2013, in line with national planning guidance to inform the evidence base for our Local Plan (2014-2029). At the current time, we have not identified a robust 'need' for GTTS sites and have subsequently not identified a site. However, if the GTTS Needs Assessment does identify a robust 'need' for a travelling site, then the provision of new sites and/or plots will be considered within the Local Plan Site Allocations document in June 2013.
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner	STRAT3	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). 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	Comment with regard to housing numbers and NPPF requirement to meet objectively assessed housing needs fully recognised. Policy STRAT3 seeks to achieve this by balancing the need to provide housing to meet local needs with overcoming existing development constraints where justified.

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					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 proactive approach to identifying suitable sites for housing development and working to overcome constraints wherever possible...' is therefore welcomed.	
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		As set out in previous submissions housing provision below 450 dwellings per annum (6,750 from 2014-2029) will not meet the full demographic based requirements, affordable housing needs or demand from in migration and will lead to a dysfunctional housing market in that a vacancy rate of 3% is considered to be an appropriate, healthy rate of vacancies, ensuring a dynamic housing market.	Comment with regard to housing numbers and NPPF requirement to meet objectively assessed housing needs fully recognised. Policy STRAT3 seeks to achieve this by balancing the need to provide housing to meet local needs with overcoming existing development constraints where justified.
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		However, the preferred strategy only seeks to find 3,550 dwellings to 2029 and is therefore in conflict with the NPPF's requirements, the local evidence base and likely, therefore, to be found unsound.	Paragraph 47 of the NPPF identifies that local planning authorities should use their evidence base to meet objectively assessed housing needs in full. The Local Plan recognises this requirement and identifies a series of housing numbers according to a range of demographic, economic and housing scenarios. These range from 120 dwellings per annum under a static employment scenario to 664 dwellings per annum based upon the continuation of short term migration trends. The baseline demographic scenario would require

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						542 dwellings to be built each year over the plan period. The Local Plan identifies that the constrained nature of land supply in Crawley means that it will not be possible to meet objectively assessed needs in full and that a large proportion of the borough's demographic housing needs over the next 15 years cannot be met within the borough boundaries and will therefore need to be met across the wider housing market area. Paragraph 179 of the NPPF identifies that joint working should enable local planning authorities to work together to meet development requirements which cannot wholly be met within their own areas due to a lack of physical capacity. Crawley Borough Council is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is on this basis, that the Local Plan seeks to be compliant with the requirements of the NPPF and therefore sound.
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		It is noted that the Council undertook a boundary review to assist in identifying new sites for development and other uses. Whilst some land around the western fringes has been identified as having some potential, and that potential is not quantified precisely, it is considered this will not	The area outside the built up area boundary is the rural/urban fringe where proposals must meet the criteria of policy CH9 which supports proposals which respect the character and role of the area.

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					<p>meet the identified shortfall. Given this, it is surprising that part of the land south of Antlands Lane which falls outside the airport safeguarding zone and adjacent to the north east sector, was not considered as part of the boundary review. This omission calls the soundness of this work into question and it should be reviewed accordingly. The owners of land south of Antlands Lane have previously submitted information that demonstrates that the site has no transport, landscape or ecological constraint that would preclude its development. That work also established that the site is within a sustainable location suitable and capable of accepting further development. The south eastern corner lies outside the airport safeguarding zone.</p>	
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		<p>As set out in Section 2 above, it is considered that provision of 8,100 dwellings from 2014-2029 is the most sustainable and appropriate level of growth in order for the Preferred Strategy to be found sound.</p>	<p>Comment noted. Whilst the need to provide approximately 8,100 dwellings over the 15 year plan period is required in order to meet the demographic needs of the population, there is not sufficient land within Crawley to provide for this number of new dwellings. The Council is actively trying to overcome existing constraints to development, particularly in relation to open space and town centre development in order to maximise the amount of new housing which can be provided over the plan period, however, it is unlikely that this will increase capacity towards provision of 8,100 dwellings (540 pa) and in order for the Local Plan to be found sound, the Borough will need to demonstrate evidence of effective cooperation with adjoining</p>

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						local authorities in order that its housing needs can be accommodated across the wider housing market area.
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		The identified deficit in housing supply needs to be addressed in line with the strategy of locating development in sustainable locations that are not physically constrained. In seeking to meet this deficit it is clear that land south of Antlands Lane can assist in meeting the shortfall in a sustainable manner, in accordance with the spatial strategy.	The land at Antlands Lane is located outside the Built-Up Area Boundary in the rural fringe. It is therefore subject to countryside policies. Part of the site is identified as Ancient Woodland (Allen's Wood). The site is also located within the land safeguarded for a second wide-spaced runway at Gatwick. This effectively prevents development (such as housing) which would be incompatible with the expansion of the airport for accommodate an additional runway. The site is also significantly affected by aircraft noise and is located within the 66 and 72 dB(A) predicted air noise contours for a twin runway. The site is not considered as a suitable or sustainable location for housing development and cannot therefore contribute towards the Council's identified shortfall in housing land supply.
James	Stevens	Home Builders Federation Ltd	0		Page 15 of the Preferred Strategy Local Plan indicates that the Borough considers that the objective need is for circa 8,100 homes. We would concur with this, derived as it is from the 2008-based household projections. This would therefore indicate that there is a shortfall in provision in the plan of some 4,600 homes. The question is whether this unmet need can be accommodated elsewhere and what steps the Borough has taken to try and broker agreements with neighbours to	Comment noted. Whilst the need to provide approximately 8,100 dwellings over the 15 year plan period is required in order to meet the demographic needs of the population, there is not sufficient land within Crawley to provide for this number of new dwellings. The Council is actively trying to overcome existing constraints to

Housing						
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					achieve this.	development, particularly in relation to the town centre and open space in order to maximise the amount of new housing which can be provided over the plan period, however, it is unlikely that this will increase capacity towards provision of 8,100 dwellings (540 pa) and in order for the Local Plan to be found sound, the Borough will need to demonstrate evidence of effective cooperation with adjoining local authorities in order that its housing needs can be accommodated across the wider housing market area.
James	Stevens	Home Builders Federation Ltd	0		SEE FULL REP. "...We would expect to see a plan prepared by Crawley that sets out how it has endeavoured to secure agreements with its neighbours to accommodate some of its shortfall of 4,600 homes. Crawley must also consider whether some of its designations and restrictions on development are still appropriate in the interest of accommodating a higher housing requirement. It should ensure that the Sustainability Appraisal assesses the potential benefits or disbenefits of loosening policy constraints and that the residents of the district are aware of the options and drawbacks of not meeting the objective need."	The Council is actively trying to overcome existing constraints to development, particularly in relation to the town centre and open space, in order to maximise the amount of new housing which can be provided over the plan period, however, it is unlikely that this will significantly increase capacity towards the provision of 8,100 dwellings (540 pa). In order for the Local Plan to be found sound, the Borough will need to demonstrate evidence of effective cooperation with adjoining local authorities in order that any shortfall in housing needs can be accommodated across the wider housing market area. The Council is currently reviewing existing policy designations and evidence base such as open space to establish whether there is any potential in

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						these policies being revised in order to accommodate new development. The public have been kept informed of such an approach through the site consultation process and advised of the balance to be achieved between changing planning policy and accommodating new housing development.
Andy	Kitchen	Pegasus Group	Persimmon Homes South East		<p>Persimmon Homes support the identification of the site at the former Ifield Community College, which already benefits from Outline Planning Permission for up to 170 dwellings. Persimmon Homes is currently preparing a detailed planning application for the site and would intend to make a start on site promptly once planning permission is achieved. However, due to its over reliance on apartment development and the Council's garden size standards, the 170 dwelling scheme cannot be achieved as envisaged by the illustrative layout the subject of the outline permission, hence the reference to 125 dwellings in the draft policy. Subject to a review of garden size standards and the substitution of the proposed extra care and residential care home facilities with residential dwellings, it is considered that the site could deliver approximately 170 dwellings. We therefore respectfully request the Council to increase the number of dwellings proposed for the site to 170. This would assist in housing delivery and make a greater contribution towards the Council meeting its objectively assessed housing needs and demand.</p>	<p>Comments noted. Ongoing dialogue is taking place with the landowner (WSSC) and developer to bring the site forward for development. The Council's space standards are proposed to be revised through the Local Plan with revised standards identified in the Submission Local Plan. In recognising the Council's limited land supply, it is not considered that the Council's housing standards unnecessarily restrict the capacity of this site. Indeed, the 170 dwelling capacity reflects that upper limit deemed appropriate for the site and is based upon a layout approved several years ago which comprises a large percentage of flatted properties which are no longer viable in the current economic climate. The capacity of the site identified in Policy H2 (125 dwellings) represents a more reasonable indication of the deliverable capacity of the site, based upon a revised layout comprising a broader mix of housing. Please refer also to the response to Comment 123 in</p>

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						relation to Policy CH6: Standards for New Housing Development.
Brenda	Burgess	0	0		investigating the transformation of some office blocks to living space. If the old docks can be converted in London and other cities, then why not our obsolete unwanted office block, many of which are new.	Comment note. Proposals for changing office space to residential now constitute permitted development. It is anticipated that the Council's annual windfall calculation (within the first five years of the plan) will include an element of office to residential conversion.
Brenda	Burgess	0	0		bring forward the green fields of Tinsley lane. I don't just mean the football club. Infact I think that could stay as there are no other facilities for the young in that area. there are other fields owned by HCA - think rented to Rentakill at some point. It might mean adjusting the roads such as bringing through an access from one of the closes. During such a development, or even if one is not possible, we desperately need play areas in the Tinsley lane area. Tinsley lane is surrounded by major busy roads and there is no where locals for children to play safely.	Comment regarding land at Tinsley Lane noted. The Council is currently in dialogue with the landowner (Homes and Communities Agency) to establish whether part of the land owned by the HCA could be brought forward for housing development in tandem with the existing and future requirements of the football club. An appropriate layout including housing mix has not been considered at this stage, given the early stage of discussions with the landowner, however, any residential development would need to take reference from the existing character of Tinsley Lane and consider the play space requirements of the area.
Brenda	Burgess	0	0		living in the Town centre? Might not be appropriate to have social housing in the area of Town centre.	Comment noted, the appropriate social mix of housing for the Town Centre is currently being considered, particularly with regard to viability in terms of the impact of social housing on development viability.
Brenda	Burgess	0	0		Mixture of housing both Social and market	Comment noted and the need to

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					desirable.	achieve a balance of housing tenures is recognised throughout the plan.
Kerry	Pfleger	Development Planning & Design Services Ltd	Private Landowner		<p>SEE FULL REP -</p> <p>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.</p> <p>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 than a scheme that is dictated by an arbitrary line.</p>	Comments with regard to site deliverability noted. The Council will continue to work proactively with the landowner/agent to bring the site forward for development within the first 5 years of the plan's adoption. The Council will investigate the noise contour line in more detail to establish whether the line currently identified as the northern boundary of the development site is appropriate taking account of physical features on site.
David	Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey		<p>SEE FULL REP -</p> <p>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 council's 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.</p> <p>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 NES Sector site where they can be integrated into the master plan for the area.</p> <p>Officers will be aware that additional housing land</p>	Comment noted, the Council is keen to see this site being brought forward for additional housing development however, there is also a recognition that there are a number of physical constraints which are likely to reduce the capacity of the land. The Council would seek to work either with the consortium or landowner to bring this site forward subject to landownership issues being resolved.

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					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 that affect the residual land (in particular safeguarding and noise from Gatwick Airport) and that the Council has identified land off Steers Lane for an additional 100 units. However it is considered that further development might be possible to the south east of the consented NES Site.	
Sally	Stallan	Horsham District Council	0		<p>We note that one of the aims for the Local Plan is to provide about 3,550 new homes by 2029. However, your Locally Generated Needs Study (LGNS) indicated a need for 542 new homes per annum (11,379 total) based on a 'natural change' baseline demographic scenario. We understand that this target may not be achievable given the constraints of the physical boundary of the Borough and the limited land available for housing. We also note that your evidence indicates that no population growth would be required in order to enable economic growth within the Borough; therefore the Draft Local Plan puts forward a 'supply-led' approach with a target of 3,543 net additional dwellings in the borough between 2014 and 2029, which equates to 236 new homes per annum.</p> <p>Whilst we recognise that the housing need is reduced through this housing target, it is still not met in full by this option, and is considerably lower than the need identified in your LGNS. As a result we as a neighbouring authority express concern that you are not meeting your housing need. With regards to this we acknowledge that we currently working closely with Crawley Borough Council and other authorities, and in particular those which share the same housing market area (Crawley,</p>	Comments noted. Work will continue to maximise the capacity of the borough to deliver greater housing in line with demographic housing needs. Dialogue is also ongoing with adjoining local authorities to maximise the opportunities for delivering sufficient housing to meet the needs of the wider Housing Market Area in line with the Gatwick Diamond Local Strategic Statement and forthcoming Position Statement on Housing Needs.

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					Mid Sussex and Horsham) to assess the most appropriate opportunities and potential solutions to the meeting the housing needs in the area. Although we recognise that it may not be physically possible to accommodate all your existing needs within your borough boundary, we expect there to have been and to continue to be an exhaustive search for all possible sites for housing. The planning policies in the strategy should recognise that these sites are a scarce resource which should be developed to their full potential, taking into account environmental constraints. This will ensure that as far as possible Crawley is doing its best to meet its own needs.	
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>	Noted. It is recognised that there is significant demand to accommodate additional employment land in Crawley over the plan period. Given the limited available land supply at Crawley, the Local Plan seeks to strike a considered balance in its approach to accommodating housing and employment needs whilst ensuring an appropriate provision of open space. Through the local plan process, the council will further explore the scope to accommodate employment requirements in Crawley once there is certainty as to the position regarding Gatwick Airport safeguarding.
Robin	Shepherd	Barton Willmore	Mayfield Market Towns Ltd		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	Comments noted. The Council will consider the robustness of these figures in a forthcoming paper on Objectively Assessed Housing Needs. This paper will be published

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					<p>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 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</p>	to support the Submission Consultation Document in January 2014.

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					<p>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>Comments noted, the Council acknowledges the implications of not meeting demographic housing needs over the plan period and is actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area rather than focusing on administrative boundaries which do not reflect the fluid nature of the housing market. It is hoped that broad agreement on housing numbers across the Housing Market Area can be reached through the 'duty to co-operate' requirement in respect of strategic priorities and it is on this basis, that the Local Plan seeks to be positively prepared and compliant with the requirements of the NPPF (para 178 and 182) and therefore sound. Both the amount and location of new housing outside of Council's administrative boundary to meet Crawley's demographic</p>

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					<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 met outside of the Borough boundary. These needs are considerable and, excluding an allowance for windfalls that Crawley Borough Council will identify in the Submission Local Plan, range from 4,140 to 9,210 dwellings over the 15 year plan period using the two demographic scenarios referred to above. This is a significant issue and one that is not adequately addressed in the Preferred Strategy Consultation Draft Local Plan.</p>	housing needs remains unknown at this stage and it is this work which is required to enable agreement on housing numbers across the Gatwick Diamond area.
Elizabeth	Burt	Savills	Crest Strategic Projects		<p>SEE FULL REP....</p> <p>In accordance with its previous representations on the CBC Housing Number consultation, CSP considers that a higher level of housing delivery is required if the Local Plan is to meet the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47 of the NPPF). For example Table 1 of the consultation document identifies that for the 'baseline' demographic 'no change' scenario there is a need for 542 dwellings per annum which equates to 8,130 dwellings over the plan period. This is significantly different to the housing figure proposed by the Council in policy H1.</p> <p>CSP strongly recommends that the Council re-assesses its evidence base for housing need and forms its housing target based on this with a robust and clear justification. Housing land capacity is not the correct basis on which to form a</p>	Comment noted. The Council is unlikely to be able to identify a significantly higher housing figure given the significance of supply constraints. The Council is currently undertaking work to identify further housing sites within Crawley's administrative boundaries in order to maximise supply and increase its identified housing requirement, however, it is unlikely that this will significantly increase supply beyond that identified in the Preferred Strategy, i.e. 240 dwellings per annum. In view of the significance of land supply constraints, the Council must seek to ensure that it identifies a housing figure which is capable of being delivered over the plan period. The Local Plan is unable to identify sites outside of the Council's

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					<p>housing target. As the Council states the Borough is constrained in terms of the amount of land available for development, the option of delivering some housing outside the Borough boundary is a logical one which needs to be fully explored to assist with meeting the Borough's housing need.</p> <p>With regard to the availability of sites outside of the Borough boundary, CSP can confirm that the site known as land between west of Bewbush and Faygate is available and developable and could contribute towards meeting some of Crawley's growth requirements over this plan period. Details of this site have been previously submitted to CBC and HDC. On this basis it is recommended dialogue takes place with CBC, HDC and the interested parties to work jointly to assess the opportunity this presents.</p>	<p>administrative boundary to contribute towards its housing land supply, however, the Submission Local Plan will recognise the fluid nature of housing markets by acknowledging that any unmet demographic housing needs will be met across the wider Housing Market Area which includes the new strategic development of Kilnwood Vale, within Horsham District Council.</p>
Michael	Simknins	Michael Simkins LLP	Private Landowner		<p>Suitable and Deliverable</p> <p>The Council acknowledges that it has limited capacity within the Borough's administrative boundary deliver future housing growth and meet the housing needs and demands of its current and future population. Consequently, as set out within the Local Plan Consultation Draft and within this covering letter, suitable and deliverable land is at a premium within the Borough given the current imbalance between the housing levels proposed and the identified housing need and demand.</p> <p>This representation and the available land holding provides the Borough Council an opportunity to deliver an additional circa 100 dwellings within the Borough, and importantly, on land currently included within the Core Strategy allocation for the North East Sector. With the principle of housing and socio-economic growth within this area</p>	<p>Comments noted. This land will be assessed in terms of its potential for housing development in conjunction with the North East Sector permitted neighbourhood. At this stage, the Council have identified a number of issues that would need to be considered including potential access and impact on locally listed buildings and ancient woodland, relocation of existing power lines, the need for buffer planting and impact on trees and biodiversity. The principle of the site being considered suitable for residential development will also need to be carefully considered given that the site would only be considered appropriate in tandem with the development of a new</p>

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					already established and supported by current Policy, the inclusion of this land as a Key Site is a logical step to aid in meeting the Borough's future housing needs.	neighbourhood. The Council will arrange a meeting with the landowner/agent to discuss the suitability of the site for housing development and its potential contribution towards housing land supply.
Charlotte	Yarker	Montagu Evans LLP	Rydon Homes, Wates Developments Ltd and Welbeck		<p>SEE FULL REP.... CBC accepts in the Draft Local Plan that it must export some 300 dwellings per annum to neighbouring authorities but does not produce any meaningful evidence as to how this could be achieved through a duty to co-operate. The Draft Local Plan says nothing more than opportunities will be considered on the edge of Crawley. However, CBC is aware of such an opportunity – land west of Ifield – but has not sought to work collaboratively with the Consortium or Horsham District Council to test its deliverability prior to the drafting of the Local Plan.</p> <p>The Draft Local Plan does not contain a policy to compel future collaborative working with neighbouring authorities to accommodate the 300 dwellings per annum shortfall. Policy H1 in effect sets out how less than half the borough's annual housing need will be delivered in the borough, but does not make a single policy provision for how the 300 dwellings per annum shortfall could be met outside its boundaries.</p> <p>The Draft Local Plan therefore fails to meet any of the four tests of soundness set out in paragraph 182 of the NPPF:</p> <ul style="list-style-type: none"> • It has not been prepared based on a strategy which seeks to meet objectively based development requirements and therefore is not positively prepared. 	<p>Crawley's Local Plan must focus on what it is able to deliver within its own administrative boundaries. Land outside the borough will be considered for its suitability for development within the adjoining authorities' equivalent Plans, as they assess the most sustainable strategic options and opportunities for meeting the wider needs of the housing market area.</p> <p>Crawley has a long established and positive working relationship with all of its neighbouring authorities – within the Gatwick Diamond and directly with adjoining authorities on an individual basis to constructively address strategic issues which cross administrative boundaries.</p> <p>CBC and HDC have worked positively and jointly in relation to possible and promoted urban extensions to the west of Crawley, and this has included meetings with the developer consortium for land west of Ifield.</p> <p>CBC and HDC continue, as part of the northern West Sussex authorities, Gatwick Diamond and with its authority partners in Surrey and along Coastal Sussex, to</p>

Housing						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<ul style="list-style-type: none"> • It does not represent the most appropriate strategy and therefore is not justified. • It is not based on effective joint working on housing delivery, a fundamental cross-boundary strategic priority and therefore is not effective. • It does not plan for issues with cross-boundary impacts and is not reflective of joint working on a fundamental area of joint interest and therefore it is not consistent with national policy. <p>There remains a significant opportunity for CBC to address how its full housing need could be met across its boundaries given that the least constrained authority proximate to Crawley, Horsham District Council, is yet to publish its preferred options for its local plan. This provides an opportunity for CBC to enter into a meaningful joint-working arrangement with Horsham prior to the submission of both plans to the Secretary of State. It is the view of the Consortium that the failure of either Horsham District Council or CBC to take this opportunity to co-operate will result in both plans being found unsound.</p>	<p>progress this work to understand whether further extensions to Crawley, to the east and west, would constitute the most sustainable housing development locations in the context of the wider housing market area and travel to work area and whether the existing infrastructure, and environmental constraints can be resolved.</p> <p>CBC welcome the opportunity to work closely with HDC to consider any new information relating to proposals in this location should it emerge through the Horsham Planning Framework process.</p>
John	Lister	Natural England	0		<p>In earlier consultation you told us that the town's open spaces should be protected even though this will limit the number of houses that can be built in the future. Do you still?</p> <p>Natural England support the protection and enhancement of green spaces. Green spaces offer many potential benefits not only to people and their health but also to biodiversity and to the natural environment.</p>	<p>The protection of open space remains a key priority of the Local Plan in guiding future development over the next 15 years as identified in the Crawley 2029 Vision which sits at the heart of the local plan and seeks to balance new development with the protection and enhancement of open space.</p>
John	Lister	Natural England	0		<p>The draft Local Plan identifies that around 240 houses should be built each year from 2015</p>	<p>Comment noted</p>

Housing						
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					<p>onwards despite the fact that over 500 houses will be needed per year. Do you agree or disagree with the 240 figure being set?</p> <p>It is not within Natural England's remit to comment on the housing allocation figure but an under provision of housing may lead to development by appeal with therefore an increased risk of proposals that do not meet the Borough's wider objectives.</p>	
John	Lister	Natural England	0		<p>To help towards meeting some of the future demands, housing should be developed in the town centre?</p> <p>Natural England agree that housing should be developed in suitable locations close to where there are already sufficient services, infrastructure and amenities to support them subject to the avoidance of damage to recognised environmental assets and the ecosystem services they provide.</p>	Comment noted
John	Lister	Natural England	0		<p>• Pound Hill - North East Sector (1900 dwellings) Natural England wish to resist the allocation of this large housing site as it could have a potentially significant impact on an area of ancient woodland, this would be contrary to policy ENV12: Biodiversity, which aims to ensure there is a net gain in biodiversity and to protect areas of ancient woodland.</p>	The North East Sector is an existing housing allocation for up to 2700 homes (Policy NES1 of the adopted Core Strategy) and includes several areas of Ancient Woodland. The approved masterplan for the neighbourhood carefully considered the impact of development on Ancient Woodland and sought to minimise impact on this woodland in terms of layout and design.
John	Lister	Natural England	0		<p>• Northgate - Town Centre North (100 dwellings) Natural England is concerned with the allocation at Northgate as the development could have a negative impact on the natural environment and in particular an area of ancient woodland.</p>	The impact of any development on the character of the town centre including trees and landscaping will be carefully considered in any development scheme. Whilst there are a number of visually significant groups of trees within the town

Housing						
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						centre, there is no ancient woodland. However, an appropriate level of landscaping (existing and new) is considered to be a key feature of the redevelopment of the town centre.
John	Lister	Natural England	0		<ul style="list-style-type: none"> • Ifield - Community College (125 dwellings) <p>This is a site identified as brownfield surplus educational land; it is located within the settlement in an area of predominantly residential use. Natural England note that although brownfield sites are often identified for redevelopment it is not always appropriate on sites of high environmental value. Further environmental assessment would be encouraged prior to any development on the site.</p>	Comment noted. Owing to the number of dwellings that could feasibly be delivered on this site, a potential planning application would require, in line with Local List of Planning Requirements (initially adopted 8th October 2010) a Open Space Assessment, which will be evaluated and assessed in conjunction with other planning considerations. In addition, a Environmental Impact Assessment (EIA) may also be required and Crawley Borough Council (CBC) could request for the potential developer to 'screen opinion' from CBC regarding the need for a EIA prior to submitting a formal planning application.
John	Lister	Natural England	0		<ul style="list-style-type: none"> • Tilgate - Thomas Bennett (96 dwellings) • Northgate - Telford Place (75 dwellings) • West Green - Southern Counties (75 dwellings) <p>These three sites are each identified as previously developed sites, located within the main built up area of the settlement within predominantly residential areas. Natural England note that whilst brownfield land is often identified for redevelopment, it is not always appropriate on sites of high environmental value. Further environmental assessment would be encouraged prior to any development of these sites.</p>	Comment noted. Owing to the number of dwellings that could feasibly be delivered on these sites, a potential planning application may require, in line with Local List of Planning Requirements (initially adopted 8th October 2010) an Environmental Impact Assessment (EIA) and Crawley Borough Council (CBC) could request for the potential developer to 'screen opinion' from CBC regarding the need for a EIA prior to submitting a formal planning

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						application.
John	Lister	Natural England	0		<ul style="list-style-type: none"> • West Green - Fairfield House (93 dwellings) Currently a vacant site having previously being used for nurse's accommodation (now demolished). Natural England note that although brownfield sites are often identified for development it is not always appropriate on sites of high environmental value. Further environmental assessment would be encouraged prior to any development of this site. 	Comment noted. Owing to the number of dwellings that could feasibly be delivered on this site, a planning application may require, in line with Local List of Planning Requirements (initially adopted 8th October 2010) an Environmental Impact Assessment (EIA) and Crawley Borough Council (CBC) could request for the potential developer to 'screen opinion' from CBC regarding the need for a EIA prior to submitting a formal planning application.
John	Lister	Natural England	0		<ul style="list-style-type: none"> • Bewbush - Breezehurst Drive (96 dwellings) This site is currently used as a car park, open space/ leisure facilities and neighbourhood centre. Natural England urge that the open space be incorporated within any redevelopment scheme and at an equivalent or higher value. 	Comment noted. Owing to the number of dwellings that could feasibly be delivered on this site, a potential planning application would require, in line with Local List of Planning Requirements (initially adopted 8th October 2010) a Open Space Assessment, which will be evaluated and assessed in conjunction with other planning considerations.
John	Lister	Natural England	0		<p>Every development that includes housing should include some "affordable housing", which is lower cost (whether available to rent or buy). The proportion of affordable housing will vary according to the scale of the development.</p> <p>It is not within the remit of Natural England to comment on the figure of required affordable housing.</p>	Comment noted
Neil	Donald	0	0		OBJECTION - First, despite your authority determining the lfield Road site as a key housing	CBC progressed with an assessment of capacity on this site

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					<p>site, I have been completely ignored. No one has consulted me on the local authority's plan, no one has discussed with me the economic viability of deciding the site is a key housing site, and this despite my raising concerns with the local authority in August this year. You advised in your e mail of 29 August 2012 that the Council would be looking to see in terms of layout and design some form of landmark building on the site and "at a density which is lower than that permitted by the outline permission". I was astonished by this and replied to you setting out my concerns on 14 September 2012. I did not receive a reasoned reply</p>	<p>within the preferred strategy following a meeting with the landowner during which viability concerns were raised with the implementation of the extant planning permission for a higher figure of 218 dwellings. The figure of 75 dwellings relates to the estimated capacity for the residential element within a mixed use scheme on this site to address this, and not commit the site through the Local Plan to a level of development which would not be deliverable. The approach taken to the preferred strategy Local Plan housing figure (as set out in the draft Policy H1) seeks to reflect the current economic climate in house building, and particularly in town centre and flatted developments. All of the town centre sites have been treated in a similar fashion, with an estimated figure for residential capacity reduced to take account of viability concerns and the potential for mixed uses.</p> <p>However, this is a minimum dwelling figure and would certainly not prevent a higher figure coming forward as part of a detailed or full planning application. The Strategic Housing Land Availability Assessment, from which this figure derives, sets out the various alternatives estimates for capacity of this site (from the outline permission of 218 units stepping up to 6 storeys; 181 units at 5 storeys, or 4 storeys of 150 units). The figure of</p>

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						75 dwellings has been taken simply as 50% of the minimum capacity expected on the site – and was certainly not intended as a ceiling figure. A viability assessment will be undertaken to gather more robust support for any of the final proposed development sites identified within the Plan.
Neil	McDonald	0	0		OBJECTION - Second -and I now intend to seek legal advice on this-having spent a shedload of money obtaining the current outline consent, having had to deal with and shoulder the delays and costs caused by objector Wilson and the local authority itself not correctly applying its own procedures, to be advised without an iota of consultation that you intend to effectively negate the consent seeking to lower the density] how can I rely on anything from the local authority as to decisions and decision making ?There is clearly no understanding on the local authority's part of the commercial effects of such a decision; I object too to being treated as if I don't matter. Have the other eight key housing sites in the borough been treated with the same cavalier, steamroller attitude?	It is hoped the council and landowner are able to work together to bring forward the most positive outcome for this site – the various stages of the Local Plan preparation provide further opportunity to refine this, particularly as this is considered to be one of Crawley's Local Plan Key Housing sites.
Sarah	Harisson	Southern Water			North East Sector, Pound Hill (1900 dwellings) There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details. This is not a constraint to development provided connection is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be accommodated.	Noted. The North East Sector has already been permitted. The developer will have to make the necessary connections to the water supply system in consultation with Southern Water.

Housing						
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					<p>It is important that this is reflected in a site specific policy.</p> <p>Ofwat, the water industry's economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the proposed development: The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a</p>	

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					<p>site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	
Sarah	Harisson	Southern Water			<p>North East Sector Residual Land, Pound Hill (100 dwellings)</p> <p>There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details.</p> <p>This is not a constraint to development provided connection is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be accommodated.</p> <p>It is important that this is reflected in a site specific policy.</p> <p>Ofwat, the water industry's economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the proposed development: The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p>	<p>Noted. The main area of the North East Sector has already been permitted. The developer for this site will have to make the necessary connections to the water supply system in consultation with Southern Water.</p>

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Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	
Sarah	Harisson	Southern Water			<p>Town Centre North, Northgate (149 dwellings)</p> <p>There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details.</p> <p>This is not a constraint to development provided connection is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be accommodated.</p> <p>It is important that this is reflected in a site specific</p>	Noted. The developer for this site will have to make the necessary connections to the water supply system in consultation with Southern Water.

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					<p>policy.</p> <p>Ofwat, the water industry's economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the proposed development: The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>It is likely that Southern Water water supply infrastructure crosses this site, the exact site location of the development is unclear from the map. We request that development design should avoid building over existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a</p>	

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					site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.	
Sarah	Harisson	Southern Water			Ifield Community College, Ifield (125 dwellings) We currently have no comments relating to this site.	Noted
Sarah	Harisson	Southern Water			Southern Counties, West Green (75 dwellings) We currently have no comments relating to this site.	Noted
Sarah	Harisson	Southern Water			Telford Place, Three Bridges (75 dwellings) Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents. We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.	Noted. The design of the development will need to take into account the position of the water supply infrastructure.

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Sarah	Harisson	Southern Water			<p>Thomas Bennett, Tilgate (96 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	Noted. The design of the development will need to take into account the position of the water supply infrastructure.
Sarah	Harisson	Southern Water			<p>Fairfield House, West Green (93 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of</p>	Noted. The design of the development will need to take into account the position of the water supply infrastructure.

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					<p>the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	
Sarah	Harisson	Southern Water			<p>Breezehurst Drive, Bewbush (96 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	Noted. The design of the development will need to take into account the position of the water supply infrastructure.
Sarah	Harisson	Southern			Neighbourhood Spatial Overviews	Comment noted and the information

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		Water			<p>We have assessed all of the domestic sites of 20 dwellings and above in the Neighbourhood Spatial Overviews section of the Preferred Strategy Consultation Draft document, with respect to water supply capacity and water supply infrastructure crossing the sites. We are unable to carry out capacity checks for the non-domestic sites as the anticipated flows to such sites are unknown. Where sites are mixed use the capacity assessment relates to the domestic aspect of the site only.</p> <p>I have also attached a spreadsheet summarising the results of these checks and giving additional information where appropriate.</p> <p>In relation to the spreadsheet please note:</p> <ul style="list-style-type: none"> o Where existing capacity is currently available, it is not possible to guarantee future reservation of this capacity. o Where existing capacity is not currently available, infrastructure improvements can be provided by developers, facilitated by the application of planning conditions. o Where infrastructure crosses the site, development design should avoid building over existing infrastructure. 	<p>Southern Water has provided is useful. The design of the development will need to take into account the position of the water supply infrastructure. Policy IN1 of the Local Plan will require all new developments to meet their own infrastructure needs when required.</p>
Sarah	Harisson	Southern Water			<p>Bewbush</p> <p>Land at Dorsten Square (21 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13</p>	<p>Noted. The design of the development will need to take into account the position of the water supply infrastructure.</p>

Housing						
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					<p>metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes. Noted. The design of the development will need to take into account the position of the water supply infrastructure. Breezehurst Drive (96 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a</p>	

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					site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.	
Sarah	Harrison	Southern Water			Furnace Green WSCC Professional Centre (76 dwellings) We currently have no comments relating to this site.	Noted
Sarah	Harrison	Southern Water			Gossops Green Land adjacent Horsham Road and South of Silchester Drive (52 dwellings) We currently have no comments relating to this site.	Noted
Sarah	Harisson	Southern Water			Ifield Little Paddocks (27 dwellings) Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.	Noted. The design of the development will need to take into account the position of the water supply infrastructure.

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					<p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p> <p>2-12 Friston Walk (21 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p> <p>Ifield Community College (125 dwellings)</p> <p>We currently have no comments relating to this site.</p>	

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Sarah	Harisson	Southern Water			<p>Langley Green</p> <p>Land adjacent to Langley Green Primary School (48 dwellings)</p> <p>We currently have no comments relating to this site.</p>	Noted
Sarah	Harisson	Southern Water			<p>North East Sector/Pound Hill</p> <p>North East Sector new neighbourhood (1900 dwellings)</p> <p>There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details.</p> <p>This is not a constraint to development provided connection is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be accommodated.</p> <p>It is important that this is reflected in a site specific policy.</p> <p>Ofwat, the water industry's economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the</p>	Noted. The main area of the North East Sector has already been permitted. The developer for this site will have to make the necessary connections to the water supply system in consultation with Southern Water.

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					<p>proposed development: The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	
Sarah	Harisson	Southern Water			<p>Northgate 21, 25, 27 & 29 Tushmore Lane (63 dwellings)</p> <p>There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details.</p> <p>This is not a constraint to development provided connection is made to the nearest point with</p>	Noted. The developer of these sites will have to make the necessary connections to the water supply system in consultation with Southern Water.

Housing						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be accommodated.</p> <p>It is important that this is reflected in a site specific policy.</p> <p>Ofwat, the water industry's economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the proposed development: The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>138-144 London Road (27 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the</p>	

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					<p>developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p> <p>116-136 London Road (64 dwellings)</p> <p>There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details.</p> <p>This is not a constraint to development provided connection is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be accommodated.</p> <p>It is important that this is reflected in a site specific policy.</p> <p>Ofwat, the water industry's economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p>	

Housing						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p> <p>The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>102-112 London Road & 2-4 Tushmore Lane (44 dwellings)</p> <p>There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details.</p> <p>This is not a constraint to development provided connection is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be accommodated.</p> <p>It is important that this is reflected in a site specific policy.</p> <p>Ofwat, the water industry's economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the proposed development:</p>	

Housing						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p> <p>Town Centre North (149 dwellings)</p> <p>There is insufficient capacity in the local water main available to serve this site. Please see the accompanying spreadsheet for more details.</p> <p>This is not a constraint to development provided connection is made to the nearest point with adequate capacity. New and/or improved infrastructure may also be required before additional flows to this site could be</p>	

Housing						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>accommodated.</p> <p>It is important that this is reflected in a site specific policy.</p> <p>Ofwat, the water industry’s economic regulator, takes the view that enhancements required to local water infrastructure as a result of new development should be paid for by the development. This ensures that the cost is passed to those who directly benefit from it, and protects existing customers who would otherwise have to pay through increases in general charges.</p> <p>We propose that the following text is included in a site specific policy to recognise the requirement for adequate utility infrastructure to serve the proposed development: The development must provide a connection to the water supply system at the nearest point of adequate capacity, as advised by Southern Water.</p> <p>It is likely that Southern Water water supply infrastructure crosses this site, the exact site location of the development is unclear from the map. We request that development design should avoid building over existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer’s expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for</p>	

Housing						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	
Sarah	Harisson	Southern Water			<p>Southgate</p> <p>St Wilfrids (69 dwellings)</p> <p>We currently have no comments relating to this site.</p> <p>Zurich House (59 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access</p>	Noted. The design of the development will need to take into account the position of the water supply infrastructure.

Housing						
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					<p>to the existing water supply infrastructure for maintenance and upsizing purposes.</p> <p>Longley Building, East Park (48 dwellings)</p> <p>We currently have no comments relating to this site.</p>	
Sarah	Harisson	Southern Water			<p>Three Bridges</p> <p>Scallows Road (21 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p> <p>Russell Way (EDF site) (40 dwellings)</p> <p>We currently have no comments relating to this</p>	Comment noted

Housing						
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					<p>site.</p> <p>Telford Place/Haslett Avenue (75 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13 metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes.</p>	
Sarah	Harisson	Southern Water			<p>Tilgate</p> <p>Thomas Bennett (96 dwellings)</p> <p>Southern Water water supply infrastructure crosses this site. Therefore, we request that development design should avoid building over this existing infrastructure so that it can continue to perform its function effectively and allow access for necessary maintenance and upsizing. These structures also require easements of 6 to 13</p>	Noted. The design of the development will need to take into account the position of the water supply infrastructure.

Housing						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>metres wide depending on the size and depth of the infrastructure. The layout of the proposed development should take these factors into account and either allow easement or diversion of the infrastructure. Any diversion should be at the developer's expense, and is subject to a feasible alternative route being available. We therefore take the view that planning policy should protect these facilities for existing and new residents.</p> <p>We propose that the following text is included in a site specific policy to ensure protection of infrastructure. We propose the following: Development proposals must ensure future access to the existing water supply infrastructure for maintenance and upsizing purposes</p>	

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
Tricia	Butcher	The British Horse Society		ENV11	Policy ENV11: Green Infrastructure This policy is welcomed and supported, especially "ii identify opportunities for enhancement"	Comments noted.
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)"	Public rights of way especially bridleways can form "green corridors". These are identified in the councils open space assessment. PRow are also an important part of a multifunctional network of green infrastructure and policies will encourage an integrated PRow network to support development.
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	This is a component of the green infrastructure network and will be included in the development of

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					the WS Local Transport Plan).	Green Infrastructure policy.
Katherine	Harrison	Surrey County Council		ENV1	<p>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 Borough Council's pledge to reducing waste in Crawley should therefore be strengthened by amending Objective 16 on page 30 to read: "Objective 16: To work towards ensuring Crawley is a carbon neutral and zero waste town by 2050." To follow this through, Policy STRAT4 and Policy ENV 1 should be revised by the addition of the words "and zero waste" immediately following the words "carbon neutral" in line 2 of Policy STRAT4 on page 34 and in line 2/3 of Policy ENV 1 on page 96. For completeness and to improve consistency, the words "and zero waste" should also be inserted after the other references to "carbon neutral" throughout the Local Plan.</p> <p>These amendments would helpfully provide further impetus to minimise waste arisings and reduce residual waste exports to surrounding areas which have the potential to increase in the medium term. This is important as the draft West Sussex Waste Local Plan (June 2012) accepts that existing landfill capacity within West Sussex will run down over the first part of the plan period and no provision is made for future landfill sites through criteria based policies or allocations other than a small extension to an existing landfill.</p>	<p>Comments noted. The inclusion of Waste in the plan would bring it in line with the Crawley Carbon and Waste Reduction Strategy aiding Crawley's ambition of being carbon neutral and zero waste by 2050. Whilst we accept that it should be included in Objective 16 and Strat 4, it is considered that an overarching new policy could bring together issues relating to waste, sustainable construction and embedded carbon. Policy to be included in submission draft.</p>
Katherine	Harrison	Surrey County Council		ENV1	The promotion of a high standard of sustainable construction, through Objective 17 on page 30, and through the promotion of the Code for Sustainable	Comment noted. The Submission Local Plan includes a simplified policy from the Preferred Strategy.

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					Homes and BREEAM in Policy ENV 1 on page 96, is supported as this will ensure compliance with the Site Waste Management Plan Regulations 2008 through supporting the re-use and recycling of construction, demolition and excavation waste (CDEW) and the 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.	Development will be required to achieve CfSH Level 3 or BREEAM excellent which includes thinking about the waste generated.
Ian	Miller	Tinsley Lane Residents Association		ENV13	<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 have been identified as having development potential.</p> <p>Oakwood F.C. has several boys and girls football teams covering all age groups and provides an extremely valuable service in developing our young people but it needs more funding to bring its facilities up to modern standards. This was</p>	Relationship between employment areas and residential streets is considered under policy CH7. Comments Noted

Environment						
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					<p>discussed with the previous owner, English Partnerships, and a draft development plan was proposed in 2003 to build houses on the north sports field while maintaining the southern half for recreation. This plan was however not considered to be viable at the time.</p> <p>Ideally these sports fields could be retained for recreation with enhanced facilities at Oakwood F.C. to include an open play area for children of residents. If this is not possible then a sustainable low density development project could be economically viable if a commuted payment from the development could be allocated to redevelop the Oakwood F. C. facilities in recognition of the contribution they make to the youth of the Borough. A low density would be necessary to avoid overloading the drainage and sewerage systems which are already close to capacity and the only practical traffic access would not be able to cope with any increase in usage without considerable adverse effect on existing properties.</p> <p>As the LDF has identified a shortage of skilled labour and of family homes this small site could be allocated for low level aspirational housing which respects the character of the surrounding area and minimises the impact on the adjacent bungalows.</p> <p>The proximity of the Manor Royal Business District makes it ideal to attract skilled workers and a safe walking distance to Hazelwick School makes the site ideal for family housing. 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>	
0	0	Crawley	0		Open spaces?	The Open Space Sport and

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
		Young Persons Council			· More open spaces for youths to just sit and relax with friends	Recreation Study will assess the distribution of open space sites and identify whether there are areas of deficiency and also areas that need to be improved. New residential development will place pressure on existing open space therefore the Local Plan will propose new and/or enhancements to open space that are needed to support development.
0	0	Crawley Young Persons Council	0		Environmental issues? · Encourage public transport/ cycling · More cycle paths are needed as members thought there are not enough which makes cycling unsafe · More emphasis on environmental care · More paths at road level · However it was noted that there must be a balance between promotion of second runway at Gatwick as well as Environmental care to avoid hypocrisy	Noted. Policies in the plan encourage the use of sustainable forms of transport. Where possible improvements to the cycle network will be sought in connection with new development. The comments in relation to the second runway are noted.
Chris	Owen	West Sussex County Council	0		Issues and Options Consultation – What you told us Reference to ‘Sites of Nature Conservation Interest’ in third paragraph should be amended to read ‘Sites of Nature Conservation Importance’.	Comment noted
Chris	Owen	West Sussex County Council	0	ENV10	Does not clearly define where Air Quality Assessments will be required which will lead to uncertainty for developers over whether or not an assessment is required. It is suggested that suitable criteria are added to the policy to determine when Air Quality Assessments will be required.	Noted. The policy has been revised to draw upon the locally-specific air quality guidance developed by Sussex Air in partnership with local planning authorities in East and West Sussex. This identifies the circumstances in which an Air Quality Assessment will be required.
Chris	Owen	West Sussex County Council	0		Biodiversity: The draft text states ‘The County Council has	Agree wording for clarity

Environment						
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					produced a register of Site of Local Conservation Importance' These sites are SNCIs. For clarity, the following wording is suggested: 'The County Council, in partnership with Crawley Borough Council, has produced a register of Sites of Nature Conservation Importance (SNCIs), sometimes also referred to as Local Wildlife Sites'.	
Chris	Owen	West Sussex County Council	0	ENV12	<p>This policy states in its third paragraph: 'The borough council will seek improvements in nature conservation value of an area in association with new development and will encourage the management and interpretation of these areas.'</p> <p>This is strongly supported although an alternative form of words is suggested: 'Developments should seek to achieve a net gain in biodiversity. The borough council will encourage the management and interpretation of biodiversity within development sites.'</p> <p>This policy states in its final paragraph: 'Opportunities to deliver a net gain in biodiversity will be taken through appropriate mitigation, enhancement, "building in" biodiversity and use of planning obligations.' Strictly speaking mitigation relates to minimising adverse impacts, for example adjusting the timing of works to avoid potential impacts such as removing trees and shrubs outside the bird breeding season. Thus mitigation in itself is unlikely to deliver a biodiversity enhancement. However, the term is often applied rather loosely. 'Net gain' requires seeking opportunities for biodiversity enhancement i.e. over and above any mitigation and compensation requirements (compensation being replacement of features and habitats lost or negatively impacted as a result of the development).</p>	Suggested wording will be considered. Agree that mitigation is not enhancement. Wording will be amended to clarify.
Andy	Evans	Miller Homes	0		The Local Plan map identifies the land at Tilgate, North of the M23 as Ancient Woodland. Whilst we acknowledge the presence of Ancient Woodland in	The extent of identified ancient woodland has increased following a Natural England review of ancient

Environment						
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					<p>this location, to our knowledge, the area is far less extensive than shown on the proposals map. The extent of the notation should be drawn consistent with the area currently defined as such.</p> <p>Land East of Brighton Road appears to be shown as Structural Landscaping on the Proposals Map. In other chapters it seems to be shown as Natural/Semi Natural Green Space though the similarity of shading for some notations makes this difficult to determine. However, the Proposals Map should show notations to which policies relate and should not be contradicted by other chapters of the Local Plan. It is not clear what policy applies to either Natural / Semi-natural Green space or Structural Landscaping. If there is none then the notation should be deleted. If a policy does apply then this should be made clear by noting the relevant policy next to the key of the Proposals Map. In any event, the land so identified includes land around Old Stone Cottage which is partially previously developed land, is clearly distinct from surrounding woodland and has no role as Green Space or Structural Landscaping and should be deleted from such notation irrespective.</p>	<p>woodland to include areas of woodland under 2ha.</p> <p>Future Local Plan policy maps will reference the relevant policy. Semi-natural open space relates to policy ENV13 and Structural Landscaping Relates to CH4.</p>
Martyn	Chase	Stanhope plc	0		The provisions in respect of the Environment are broad ranging, and are broadly supported. We would like to see additional consultation prior to the unilateral implementation of CIL in respect of the infrastructure works.	Noted. The introduction of a CIL charging schedule will be subject to its own consultation requirements.
Tony	Fullwood	Tony Fullwood Associates	Mr M Robinson	ENV11	<p>OBJECTION - Oaksworth</p> <p>The map on the first page of the Environment Chapter appears to indicate a natural and semi natural space designation over garden land primarily laid to lawn (see Appendix 2). The area has been surveyed by planners, does not meet the definition of natural and semi-natural open space and must be deleted from the Environment Map.</p>	<p>Agree that this garden is not natural/semi-natural open space.</p> <p>Enhancement of GI as part of the intensification of this site is noted.</p>

Environment						
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					<p>Land to the south of this area in the ownership of my client is correctly classified as natural and semi natural open space.</p> <p>As part of any development proposals to intensify the use of the Oaksworth site, my client has offered to allow access to the natural and semi natural open space to increase access to the countryside and the surrounding green infrastructure as strongly supported in consultation responses. Support was expressed for the provision of new areas of green infrastructure and, subject to a satisfactory outcome in relation to intensification of the use of the site of Oaksworth, the natural and semi natural site to the south of the proposed built up area could be allocated as an additional area of public open space in the Local Plan.</p>	
Tony	Fullwood	Tony Fullwood Associates	Mr M Robinson		<p>OBJECTION - Oaksworth along with other developed areas is shown as a Green Corridor on the Green Infrastructure Assets and Opportunities Map. It is unclear how the area has been defined. Certainly, the area contains built development and for this reason, there should therefore be no policy in the Local Plan that seeks a 'blanket' refusal of future proposals.</p>	This area is not shown as a green corridor on the GI map. It is within a conservation area and adjacent to a public bridleway.
Cill	Temple-Pediani	KTI Energy Limited	0		You must co-operate with Horsham District Council on any infrastructure relating to decentralised generation and distribution of electricity and heat.	Cross boundary working is being undertaken with regard to decentralised energy and other sustainable policies.
Jack	Straw	Mole Valley District Council	0		<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</p>	9 - with regards to the need for housing and the limited supply of land, the council is undertaking an open space review to identify the needs and opportunities for open space, sport and recreation in Crawley this includes areas of surplus and deficit to ensure that the most important open space is protected, opportunities to enhance

Environment						
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					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.	open space and also identify areas that could change to make the best use of land to meet the aims of the Local Plan.
Tony	Fullwood	Tony Fullwood Associates	Mrs J Williams	ENV11	<p>OBJECTION - Land off Saxon Road</p> <p>The map on the first page of the Environment Chapter appears to indicate an amenity open space designation over land off Saxon Road. Assessing needs and opportunities: a companion guide to PPG17 remains part of Government guidance. It defines the primary purpose of the amenity open space typology as Opportunities for informal activities close to home or work or enhancement of the appearance of a residential or other area. As the site is not publically accessible, it does not provide opportunities for informal activities. The site is well screened to the north, south and east by hedged and treed boundaries and to the west by development. It therefore has a very limited role in terms of visual amenity. Rather, the boundaries are important to local visual amenity and the character of the area, but for the reasons set out above, the whole site cannot be described as an amenity open space.</p> <p>The area has been surveyed by planners, does not meet the definition of amenity open space and amenity open space must be deleted from the Environment Map.</p> <p>As part of any development proposals to intensify the use of land off Saxon Road, my client has offered to allow access to part of the site to increase</p>	The area outside the built up area boundary is the rural/urban fringe where proposals must meet the criteria of policy CH9 which supports proposals which respect the character and role of the area.

Environment						
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					access to the countryside and the surrounding green infrastructure (as strongly supported in consultation responses where support was also expressed for the provision of new areas of green infrastructure.	
Tony	Fullwood	Tony Fullwood Associates	Mrs J Williams		Green Infrastructure Assets and Opportunities Evidence Base Map Land off Saxon Road along with other developed areas is shown as a Green Corridor on the Green Infrastructure Assets and Opportunities Map. It is unclear how the area has been defined. Certainly, the area contains built development and for this reason, there should therefore be no policy in the Local Plan that seeks a 'blanket' refusal of future proposals.	This area is not shown as a green corridor on the GI map. It is within a conservation area and adjacent to a public bridleway.
John	Cooban	0	0		<p>The new local plan needs to include a comprehensive Tree Strategy – preferably a complete section in its own right, or at least its own section in Environment or maybe even Infrastructure, on the basis that Green Infrastructure should be considered at least as the same level as any other element of infrastructure, and that trees are the most important element in green infrastructure.</p> <p>The starting point for tree strategy might be the Trees in the Townscape document produced by TDAG, and Trees in Towns II.</p> <p>It needs to deal with all urban tree cover as a continuum, certainly looking beyond 2029. Presently, CBC is not coordinated at present re trees. It is about all tree cover, regardless of ownership. It is crazy that Planning and Amenity services have separate tree databases.</p> <p>You won't get a proper tree strategy though, unless you get tree key personnel at high level and change</p>	There are currently no plans to produce a tree strategy to support Local Plan policies. The Local Plan will seek to protect and enhance tree cover as an important part of our green infrastructure and contribution to the character of the town. This will be through the normal requirements of all development, tree policy structural landscaping, biodiversity, green infrastructure and development beyond the built up area boundary policies.

Environment						
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					<p>culture.</p> <p>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.</p> <p>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 for protecting, maintaining, enhancing, renewing and monitoring urban tree cover as land passes through your scope. Getting the right scheme content to start with, rigorously applying BS 5837, making sure you can enforce the tree / landscape related Conditions, and making sure that essential tree planting is thriving before the end of your 5 year control time-out. Etc.</p> <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 -</p> <p>"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>Comment noted. We believe that the current approach, of considering a requirement above that of national standards may be acceptable where we have a proven need. Further assessment in relation to whether this is a percentage increase or relates to carbon credits is still being considered. Cross boundary working with adjacent authorities and building control is central to this assessment.</p>

Environment						
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					"...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..."	
Sally	Stallan	Horsham District Council	0		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 adaption 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.	Comment Noted. We welcome the opportunity to continue cross boundary working in relation to sustainability policies.
Tim	Hoskinson	Savills	Wilky Group		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.	Comment Noted. We welcome the support for the policies.

Environment						
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					<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 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 – 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	The Crawley Landscape Character Assessment Part 1 can be found in the background documents section and is also referred to in preferred Policy CH12. The edge as drawn on

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>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. This demonstrates that the land between west of Bewbush and Faygate presents a suitable and less environmentally constrained option for the delivery of housing and should therefore be considered by CBC as a potential option for the delivery of housing. Its development would also form a logical extension to the Kilnwood Vale site. CSP has submitted a detailed site assessment to HDC to demonstrate the suitability of the site for development and it is strongly recommended that CBC liaises with HDC to discuss the merits of the site and opportunity to deliver some of Crawley's housing need here.</p>	<p>the map relates to the area within Crawley and access beyond. The Kilnwood Vale site is considered in this assessment.</p>
Rob	Matthews	Gatwick Airport Ltd.	0	ENV8	<p>GAL supports the general thrust of this policy to prevent unacceptable risks and / or harm from environmental pollution and / or land contamination.</p> <p>GAL questions, however, whether this policy should relate to the potential pollution impacts of development other than noise and air quality given that the subsequent proposed policies – Policies ENV9 and ENV10 - separately cover noise and air quality.</p> <p>As drafted it would appear that the draft policy does encompass the broad range of environmental pollution issues including noise and air quality. If so</p>	<p>Support is noted and welcomed. The intention of the policy is to provide general guidance in relation to the management of pollution through development. Greater consideration is applied to issues of air quality and noise in separate policies. Agreed that there is merit in adapting the wording of sub clause (b) to better reflect the objectives of the NPPF, and the policy has been amended.</p>

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>it duplicates elements of Policies ENV9 and ENV10.</p> <p>In any event GAL suggests that the word 'material' in sub clause (b) should be changed to 'unacceptable' to properly reflect the advice in bullet 4 of paragraph 109 of the NPPF. Suggested Changes to Policy ENV8</p> <p>The duplication with Polices ENV9 and ENV10 could be overcome by explaining in the reasoned justification that the impacts of development on air quality and noise are separately covered by Policies ENV9 and ENV10.</p>	
Rob	Matthews	Gatwick Airport Ltd.	0	ENV9	<p>GAL supports the inclusion of Policy ENV9.</p> <p>GAL has in the past objected to new noise sensitive development such as housing, when it has been proposed in locations that it considers could be exposed to unacceptable levels of existing or future aircraft noise. GAL's representations in those cases have been based on the advice that was contained in the now revoked Planning Policy Guidance Note 24 (PPG24).</p> <p>At the same time GAL accepts, as proposed in Policy ENV9, the imperative of mitigating so far as possible the noise from proposed noise generating development.</p> <p>The specific advice in the NPPF on planning policies for noise is at paragraph 123 of the NPPF.</p> <p>This states the aim to "avoid noise from giving rise to significant adverse impacts on health and quality of life". GAL considers it would be appropriate to reflect this national policy aim within the policy to provide appropriate context to the expected level of mitigation.</p>	Support is noted and welcomed. In the absence of national noise guidelines, the intention is to draw upon the Sussex Planning and Noise Advice document, and former guidance of PPG24 to produce a local plan noise appendix that will guide and inform planning decisions, as encouraged in the DEFRA Explanatory Note to the Noise Policy Statement for England (2010).

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>Given the policy vacuum left by the revocation of PPG24 GAL also supports the need for technical advice to support the interpretation of policy and to ultimately inform planning decisions. In this regard it is relevant to note that the Coalition Government is currently preparing a new Aviation Policy Framework and within that framework is expected to come to a view on appropriate noise thresholds.</p> <p>GAL would expect the Government's conclusions to be reflected in the locally prepared guidance.</p> <p>The Government is expecting to publish its Aviation Policy Framework in Spring 2013 which will allow its conclusions to be taken into account in the preparation of the Noise Guidance Document referred to in the draft policy. GAL would be pleased to support the preparation of the Guidance... SEE FULL REP</p>	
Rob	Matthews	Gatwick Airport Ltd.	0	ENV10	<p>GAL supports the inclusion of Policy ENV10.</p> <p>Whilst generally supporting the intention behind the policy GAL is concerned that the absolute requirement in first paragraph of the policy for any development (supported by an Air Quality assessment) to not worsen air quality is unduly prohibitive.</p> <p>Clearly there will be cases where this imperative will be important, for example development in or impacting on Air Quality Management Areas where existing levels of emissions already exceed or come close to Air Quality Standards, or where the development would in itself or cumulatively with other development be likely to lead to such a breach.</p>	Noted. The policy wording has been revised in liaison with Environmental Health to ensure that the local plan policy approach is robust, but is not unduly prohibitive. Wording has been amended to take account of any 'material worsening' of air quality, as suggested.

Environment						
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					<p>However, it should also be noted that even small scale developments such as commercial or residential developments and developments, such as affordable housing built to Code for Sustainable Homes Level 6, would also have some adverse impact on air quality arising from, for example, traffic generation.</p> <p>For these reasons it is considered that the impact test should be reworded so as not to cause a 'material worsening' in air quality.</p> <p>The supporting text can explain the importance of ensure no worsening of air quality in AQMAs and where possible that development should lead to improvements in air quality.</p> <p>GAL would suggest that paragraph 1 of the policy be amended so as to read as follows... SEE FULL REP</p>	
Alyson	Jones	Barton Willmore	SEGRO	ENV1	<p>In general the policy requirements and supporting text are unnecessarily complicated and difficult to understand. Such detail should not be set out in the Local Plan document.</p> <p>It is considered that there is no justification provided as to why national minimum standards for overall carbon performance should be required. The identification of low carbon energy as a priority by the Council is not considered a reasoned justification. SEGRO considers that the approach should only reflect that required by national planning policy and Building Regulations. SEGRO is of the view that it is not the place of the planning system to seek to impose more stringent requirements where other national legislation already covers it, and that LPAs should not seek to go beyond what is nationally required. Whilst some developers may</p>	<p>Comment noted. The council believe that the current approach, of considering a requirement above that of national standards may be acceptable where we have a proven need. Further assessment in relation to whether this is a percentage increase or relates to carbon credits is still being considered. Cross boundary working with building control is central to this assessment. Officers are considering development of an SPD to contain more detailed information and are looking to simplify the overarching policies contained within the Local Plan. Viability work is being undertaken on all policy</p>

Environment						
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					<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>	requirements.
Jennifer	Wilson	Environment Agency	0		<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</p>	Noted. It is intended that collectively, the emerging policy approaches of the local plan will have a positive role to play in achieving Water Framework Directive objectives. However, it is recognised that the plan would benefit from greater

Environment						
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					<p>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.</p> <p>....SEE FULL REP</p>	<p>acknowledgement of WFD requirements and implications for Crawley. Consideration of the manner in which policies contribute to achieving WFD objectives and meeting wider sustainability targets will be included within the submission local plan.</p>
Jennifer	Wilson	Environment Agency	0	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 retrofitting 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:</p> <ol style="list-style-type: none"> 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 domestic energy use accounts for approximately 27% of UK energy demand. Domestic energy efficiency has a big part to play in local contributions to emission reduction targets 2. The Environment Agency and Energy Savings Trust have published "Quantifying the energy and carbon effects of water saving" It can be found here on our external website: http://www.environment-agency.gov.uk/business/topics/water/109835.aspx 	<p>An additional overarching policy is being considered that will identify the benefits or retrofitting existing stock, consequential improvements, and embedded carbon.</p>

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					This report shows where the carbon emissions come from relating to water and hot water use (in the home and by the water company). This report states that water in the home is responsible for 89% of water related carbon emissions.	
Jennifer	Wilson	Environment Agency	0	ENV4	We support this policy ENV 4.	Support welcomed and noted.
Jennifer	Wilson	Environment Agency	0	ENV6	<p>SEE FULL REP...</p> <p>We support this policy however we believe that in the current wording there is an oversight that we believe should be addressed.</p> <p>Bullet point (ii) states:</p> <p>“all major development (10 or more dwellings, or non-domestic developments of 1000sqm or more) etc....”</p> <p>If there were proposals for lots of smaller (less than 10 dwellings) developments, the cumulative effect on water resources could be equal or more than for a major project that was required to comply with your current policy. A similar argument could be made for non-domestic developments of less than 1000 sqm.</p> <p>To achieve level 3/4 for water use only will cost around an additional £189 per property (over and above baseline cost for standard appliances). To achieve level 5/6 for water use only will cost an additional £3,229 above baseline cost because a greywater or rainwater harvesting system would be required. (WRc Report UC7231 for the Environment Agency Sept 2006)....</p>	<p>Noted. A water cycle study update and viability study will be undertaken to ensure that any requirements asked for do not make development unviable. Further to this any policy requirement will ensure that the Serious Water Stress is addressed.</p> <p>The policy included in the Submission Local Plan has taken your comments into account and is based on the Water Cycle Study Update that has been prepared in 2013. The report you referenced has also been taken into account when preparing the viability assessment.</p>
Jennifer	Wilson	Environment Agency	0	ENV8	We support this policy, although we believe reference to its contribution towards the objectives of the WFD should also be included within the pre	Noted. It is agreed that the local plan should seek to ensure that relevant policies contribute towards achieving

Environment						
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					and post policy text. This would provide additional justification for this policy, in reducing the risk to ground and surface waters.	WFD objectives. The Submission Local Plan policy approach will guide the relationship between development and sustainable water management.
Jennifer	Wilson	Environment Agency	0	ENV11	<p>The policy on Green Infrastructure (GI) is a bit vague, and does not provide a time table for delivery of a plan or any actual delivery on the ground. The policy needs to give developers a clear steer, of what is expected from them. The purpose of the policy should be to Create, Protect, Enhance and Extend GI within Crawley for the benefit of communities and wildlife alike.</p> <p>River corridors are great contributors to GI, but this has not been mentioned in the policy, any pre amble or justification text.</p> <p>We believe the policy should be amended to;</p> <ul style="list-style-type: none"> • provide a clearer picture of how the authority proposes to contribute to the England Biodiversity Strategy and the other aspects of this; • identify and implement a green infrastructure network through not just the safeguarding, enhancing and extending existing areas of GI or green open space but also create, through a generous provision of GI, green space and water bodies in new development proposals; • ensure that linkages between existing and new GI areas are created and protected; and • ensure the integrity of the network of green infrastructure is protected and enhanced through the lifetime of the LP. 	It is anticipated that a Green Infrastructure plan to identify opportunities for enhancement and also guidance for developers on providing GI in new proposals will be developed.
Jennifer	Wilson	Environment Agency	0	ENV12	<p>...SEE FULL REP</p> <p>We would suggest the following minor changes to this policy for clarity (in bold):</p>	Policy wording will be reviewed to consider suggested amendments.

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					To ensure a net gain in biodiversity...	
Jennifer	Wilson	Environment Agency	0		<p>Protected Species There needs to be a clear policy on protected species of wildlife, so that developers are aware that the presence of protected species is a material consideration in the planning process. Ecological surveys must be conducted prior to seeking planning permission and should not be dealt with by way of conditions.</p> <p>In the case of European protected species present on land proposed for development, recent case-law dictates that a mitigation strategy must also be submitted to the local planning authority (LPA), prior to seeking planning permission.</p> <p>If a mitigation licence from Natural England is likely to be needed i.e. an offence is likely to occur if development proceeds, then the LPA must be satisfied that the three tests imposed by the Habitats Regulations (2010) are met. They are:</p> <ol style="list-style-type: none"> 1. The proposed development must meet a purpose of preserving public health or safety or other imperative reasons of overriding public interest, including those of a social or economic nature or of primary importance for the environment 2. that there is no satisfactory alternative 3. that the action authorised will not be detrimental to the maintenance of the population of the species concerned at a favourable conservation status in their natural range. <p>This not only applies to full planning permission but also for outline permission, for listed buildings consent and for building regulations consent. If the developer can show how the need for licences will be avoided, then the tests do not need to be applied</p>	Inclusion of protected species policy will be considered.

Environment						
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					<p>by the LPA</p> <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	0		<p>New development should be designed and built in a way to reduce energy use and encourage the use of cleaner energy.</p> <p>In seeking to reduce greenhouse gas emissions Natural England agree with adopting design and construction methods to reduce energy use and encourage the use of low carbon energy.</p>	Comment Noted & Agreed. Policies within our Environmental and Character chapters aim to ensure this is the case. In particular Policy ENV1 asks that development is "Lean". This refers to the buildings design and includes factors such as orientation and materials
John	Lister	Natural England	0		<p>Development should be managed in such a way that it does not put Crawley's wildlife or natural environment at risk.</p> <p>Natural England wish to encourage development to respect wildlife, natural environment and the ecosystem services that are provided and encourage a wider landscape view of such assets to be taken in the context of the anticipated consequences of climate change.</p>	Comment noted - The council is seeking a net gain in biodiversity.
John	Lister	Natural England	0	ENV1	<p>Natural England support the emphasis given to the increased supply and use of renewable and/or low carbon energy in principle, although would like to draw attention to the guidance as set out within the NPPF which sets out the likely impacts of potential wind energy development when identifying suitable areas, and in determining planning applications for such developments: http://www.decc.gov.uk/assets/decc/11/meeting-</p>	Comment & Support Noted - The Decentralised Energy Study looked into the opportunities for wind turbines within the Borough and found limited scope for large scale developments mainly as a result of the proximity to Gatwick Airport. There was the possibility of small scale energy generation and these

Environment						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					energy-demand/consents-planning/nps2011/1938-overarching-nps-for-energy-en1.pdf Natural England welcome the three-step energy hierarchy introduced by the Borough to ensure all development minimises carbon dioxide emissions.	would be looked at on a case by case basis.
John	Lister	Natural England	0	ENV2	Natural England support the encouragement of developments to use renewable and low carbon energy. Though it is important that costs to the natural environment are avoided or minimised where possible This issue is covered within part iv of policy ENV2; 'the applicant will need to demonstrate that the proposed location is a suitable area for the type of energy development proposed as per recognised good practice criteria'.	Support Noted.
John	Lister	Natural England	0	ENV5	Natural England notes and support the adaptation measures identified within policy ENV5, in particular making use of the natural environment i.e. tree planting to help moderate the heat island effects.	Support Noted.
John	Lister	Natural England	0	ENV11	This policy aims to protect, enhance and support the green infrastructure within the Borough. Natural England welcome this aim and suggest reference to the following good practice guidance in reference to Green Infrastructure and biodiversity: http://www.tcpa.org.uk/data/files/TCPA_TWT_GI-Biodiversity-Guide.pdf	Comment noted
John	Lister	Natural England	0	ENV12 & ENV13	As it is Natural England's statutory purpose to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, Natural England support policy ENV12 and in particular the statement to ensure there is a net gain in biodiversity and to protect areas of ancient woodland. Natural England recognise the importance of open space, sport and recreation in delivering a sustainable community, and therefore support policy ENV13 which restricts development that remove or affect the continued use of existing open space,	Comments noted

Environment						
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					sport and recreational spaces.	
Sarah	Harrison	Southern Water	0	ENV6	<p>We support policy ENV6 which encourages water efficient development.</p> <p>Southern Water promotes efficient use of water as part of a twin-track approach of managing demand for water, including leakage, as well as providing additional resources. This twin-track strategy has been developed in collaboration with the Environment Agency and helps to minimise the volume of water taken from the environment.</p> <p>In promoting the Code for Sustainable Homes, the planning authority will need to ensure that this design and construction standard is enforced. Water companies do not have the necessary accreditation to assess at the design stage or perform the necessary post-completion checks.</p> <p>Where grey water recycling is proposed the planning authority will also need to consider the maintenance requirements of the systems to ensure that hygiene standards are maintained, so that there are no negative health impacts to future residents.</p>	Support noted. We hope that the policy supports your twin-track approach. Your points will be taken on board as we move towards implementation.

Infrastructure						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
Katherine	Harrison	Surrey County Council			<p>Transport Development Planning</p> <p>The approach to airport parking appears to be reasonable and we look forward to being consulted on any major future proposals for such development. We would also anticipate Crawley Borough Council consulting us on any significant changes to the approved development scheme for 1900 homes in Crawley North East Sector. We</p>	Noted. Liaison will continue with Surrey County Council on relevant matters which include the impact on the transport network.

Infrastructure						
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					further expect to be consulted at an early stage on the proposals for Town Centre North. Early consultation in the event of such proposals coming forward is important because of the potential transport impacts on Surrey and the local road network.	
Dr	Temple-Pediani	KTI Energy Limited			You must co-operate with Horsham District Council on any infrastructure relating to decentralised generation and distribution of electricity and heat.	Noted. There are ongoing discussions with Horsham regarding a whole range of matters including District Energy Networks.
John	Cooke	Mobile Operators Association			SEE FULL REP - In short the MOA are suggesting a policy relating to telecommunications development within the borough and provide reasons for such a policy.	Noted. The plan does not seek to repeat requirements set out in existing legislation so do not consider a policy is required.
John	Cooban				<p>The new local plan needs to include a comprehensive Tree Strategy – preferably a complete section in its own right, or at least its own section in Environment or maybe even Infrastructure, on the basis that Green Infrastructure should be considered at least as the same level as any other element of infrastructure, and that trees are the most important element in green infrastructure.</p> <p>The starting point for tree strategy might be the Trees in the Townscape document produced by TDAG, and Trees in Towns II.</p> <p>It needs to deal with all urban tree cover as a continuum, certainly looking beyond 2029. Presently, CBC is not coordinated at present re trees. It is about all tree cover, regardless of ownership. It is crazy that Planning and Amenity services have separate tree databases.</p> <p>You won't get a proper tree strategy though, unless you get tree key personnel at high level and change culture.</p>	There are currently no plans to produce a tree strategy to support Local Plan policies. The Local Plan will seek to protect and enhance tree cover as an important part of our green infrastructure and contribution to the character of the town. This will be through the normal requirements of all development, structural landscaping, biodiversity, green infrastructure and development beyond the built up area boundary policies.

Infrastructure						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>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.</p> <p>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 for protecting, maintaining, enhancing, renewing and monitoring urban tree cover as land passes through your scope. Getting the right scheme content to start with, rigorously applying BS 5837, making sure you can enforce the tree / landscape related Conditions, and making sure that essential tree planting is thriving before the end of your 5 year control time-out.</p> <p>Etc.</p> <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>	
Jane	Noble	West Sussex Local Access Forum			<p>It also recognises the important part played by green infrastructure in providing access across the Borough. This is especially true of public rights of way (green corridors), which provide links from within the development to the wider countryside. New development can provide a unique opportunity to solve present problems and provide missing links in the network of prows, which are the principal means to access the countryside. This will enhance the ability of local people, both existing and new residents, to enjoy access to the countryside, and is</p>	<p>New links are encouraged through policy CH3 a). This will be supported by GI policy and also policy CH12 development beyond the built up area boundary which takes into Landscape Character Assessment recommendations to enhance countryside access.</p>

Infrastructure						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					particularly important as Crawley is predominantly an urban borough.	
Sally	Stallan	Horsham District Council			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.	Noted. The Borough Council has undertaken a transport assessment of the impact of the proposed levels of development on the network. This takes into account the impact of development located close to the Borough boundary. This will help ensure that the transport impact of development is acceptable and that any mitigation measures are in place.

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
Chris	Owen	West Sussex County Council	0	GAT1	Growth at Gatwick Airport will have a significant impact on surface access in addition to the environmental issues already covered by proposed Policy GAT1. Although covered by other policies in the Plan, given the significance of the impact on the local area, it is felt that reference should be made to impact on surface access in the Gatwick Airport policies, particularly as current Policy GAT5 is not being directly replaced. It is suggested that reference to surface access is added to part (ii) of the policy to ensure that the impact of growth on surface access can be satisfactorily mitigated in line	Agreed. A reference to mitigating the impact of growth of the airport on surface access to be included in GAT1.

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					with Local Plan Objective 9.	
Jack	Straw	Mole Valley District Council	0	GAT1	<p>12. The provisions of Policy GAT1 are noted and reflect the aspirations of Gatwick Airport Ltd which are contained in the 2012 Gatwick Master Plan. The requirements of criterion (ii) are agreed as far as they go but we would wish to see it expanded so that the list of passenger growth consequences to be mitigated includes the visual impact of new development (thinking here of the Master Plan's indication of additional hangars in the North West Zone), the surface traffic consequences of additional passengers and the general urbanisation effects that will come with the growth of the airport to 45 million passengers.</p> <p>13. It is not clear whether the new legal agreement referred to in the second paragraph of the reasoned justification to Policy GAT 1 is the same agreement that will emerge from the review of the 2008 agreement (i.e. as referred to in the 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.</p>	<p>A reference to surface access is to be added to criterion (ii) as well as visual impact. It is not felt appropriate to refer to the general urbanisation effect of the growth of the airport in this policy as policies elsewhere in the Plan consider the impact of the growth of the town and the economy. The review of the 2008 agreement which is required to be in place will include an assessment of the appropriate time period that the agreement should cover and the likely passenger throughput likely to be achieved in that period. Appropriate mechanisms will be considered to address the potential for growth to occur quicker than anticipated.</p>
Peter	Mason	Tandridge District Council	0	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</p>	<p>The policy supports the principle of 45 mppa subject to the appropriate environmental safeguards being in place which it would seek to be achieved through the signing of a revised S106 agreement. Given the timeframes involved it is difficult to assess the precise environmental impact at this time as it is anticipated that technology will moved on. However, it is felt that the appropriate mechanisms are in place</p>

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					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.	to ensure that the impact is considered at the appropriate time.
Rob	Matthews	Gatwick Airport Ltd.	0	GAT1	<p>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 Council and many other stakeholders and has historically informed local planning policy relating to the airport.</p> <p>In 2011, Gatwick handled 33.7 million passengers, the total number of aircraft movements was 251,070 and 88,214 tonnes of cargo was carried. Growth forecasts were undertaken to inform the Master Plan and take into account the current economic position of the UK and Europe and the effects of growth at other airports in the south east. These predict a steady increase in passenger numbers at Gatwick, rising to 36 mppa by 2015/16, 40.2 mppa by 2021/22 and potentially 45mppa by 2030.</p> <p>In order to facilitate the projected growth, a number of operational developments will be needed to serve the increased passenger and aircraft numbers, as well as associated airside and landside support services. The Master Plan identifies the existing land uses at the Airport, including approximately 22 hectares of unallocated land within the airport</p>	Noted.

Gatwick Airport						
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					<p>boundary and outlines the types of developments and techniques that may be required moving towards 40mppa and thereafter potentially to 45 mppa. These include:</p> <ul style="list-style-type: none"> Optimise the use of existing infrastructure; New infrastructure to support new, more efficient aircraft types; Expansion and improvement of the North and South Terminals; Replacement and extension of aircraft piers; Reconfiguration of maintenance hangars and facilities; Reconfiguration of existing, and introduction of new car parking; Re-surfacing of the main runway and reconfiguration and upgrading of taxiways; Surface access improvements; Development of on-site energy centres. <p>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.</p> <p>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.</p> <p>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.</p> <p>Save for the following point GAL is, therefore, wholly supportive of policy GAT1.</p>	

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>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 the airport onClimate Change.”</p> <p>GAL is committed to managing and minimising the impacts of the airport’s development including the climate change impacts that are within its control. These include for example the way buildings are designed so as to be energy efficient in their construction and operation, the adaption of facilities to climate change and managing surface access demands so as to reduce greenhouse gas and other emissions which contribute towards climate change. GAL’s commitment to carbon management and reduction is set out in GAL’s Decade of Change and Carbon Management Action Plan.</p> <p>There is, however, a wider debate about aviation’s global impacts on climate change through emissions from aircraft in flight. GAL is concerned that the way the policy as drafted could be interpreted as meaning that GAL also needs to control these wider impacts of aircraft operations from Gatwick (i.e. the emissions from aircraft flying to and from Gatwick) when bringing forward developments. These matters are not within GAL’s control but are subject to national, European and international commitments and actions including carbon emissions trading aircraft engine technology, airspace efficiency improvements. GAL does of course, seek to influence changes that will reduce aviation climate change impacts that are outside its control, but does not have direct control on these wider initiatives. This interpretation could also be inferred due to other policies in the draft plan which seek to limit and reduce carbon emissions, for example ENV1, ENV5 and IN3.</p>	

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>Suggested Changes to Policy GAT1</p> <p>For the above reasons GAL considers that the reference to 'climate change' in criteria (ii) of the policy should therefore be removed.</p>	
John	Lister	Natural England	0	GAT1	<p>Natural England emphasise the importance of the safeguards to mitigate the operation of the airport on the natural environment as highlighted in point ii of policy GAT1; the impact of the extended airport on noise, air quality, flooding and climate change will all need to be considered and regularly monitored.</p> <p>Natural England consider airports in general to have a negative impact on the natural environment. The policy justification text mentions that the initial S106 agreement which related to the environmental impact of the growth of the airport is due for re-negotiation by 2015. Natural England support the ongoing protection and enhancement of the natural environment within the area.</p>	Noted.
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner	GAT2	<p>It is acknowledged that land safeguarded for a potential second runway at Gatwick is a major constraint on finding sufficient land suitable for housing and economic development. It is also accepted that airport safeguarding is a national policy driver. However, given the Davis Commission investigation into the future of London's airports and other potential locations for new capacity to be developed, there is uncertainty as to whether a second runway will be required and if so what form it will take. It is also understood that the safeguarding area is the estimated maximum requirement for a second wide spaced runway. Further evidence refining the precise requirements will be submitted to the Davis Commission from spring 2013.</p>	The text of the plan will refer to the latest position with regard to national aviation policy at the time of writing and any implications that may arise from the final report of the Davies Commission.

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					Given the above, and the need to find more land for housing and employment, it is considered necessary that the safeguarding policy, GAT2, should include a reference to reviewing the safeguarded area on the receipt and analysis of additional information to, and conclusions from, the Davis Commission.	
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner	GAT2	The potential of this land must be reviewed once additional information is submitted to the Davis Commission in spring 2013 and once the Commission reports in winter 2013 and summer 2015. This must be reflected in Policy GAT2.	Noted. The consequences of the outcome of the Davies Commission for the safeguarded area will be considered at the appropriate time.
Peter	Mason	Tandridge District Council	0	GAT2	It is considered that no action is required to deal with the possibility of a second runway beyond the requirement to safeguard land.	Land will continue to be safeguarded for a second runway until there is a clear national policy not to do so.
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.	Government guidance in the 2003 Aviation White Paper requires land to be safeguarded should a second runway at Gatwick be needed. This position is supported by the Draft Aviation Policy Framework. Until the issue of additional runway capacity is resolved following the work of the Davies Commission, land will continue to be safeguarded.
Rob	Matthews	Gatwick Airport Ltd.	0	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	Noted. The Borough Council has sought to clarify the meaning of incompatible development.

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>area.</p> <p>GAL supports the principle of Policy GAT2 and the continued safeguarding of land for a potential second runway. This reflects the existing requirement for safeguarding set out in the ATWP and Draft Aviation Policy Framework and is a sensible and far-sighted approach given the current uncertainty on future aviation policy, alongside Government commitment to economic growth guided by new planning legislation and the NPPF which focuses on economic growth and sustainable development.</p> <p>Since the existing policy was adopted in 2007 there have been a number of planning applications that have been considered against Policy G2. Based on this experience GAL considers it would be appropriate to seek to increase the clarity in Policy GAT2 as to development which will and will not normally be accepted.</p> <p>Suggested Changes to Policy GAT2</p> <p>Whilst GAL supports the policy, GAL considers it would nevertheless be helpful if the policy itself were now to provide greater clarity of those uses and types of development that would be compatible with future development, and those which would not. SEE FULL REP...</p>	
Jack	Straw	Mole Valley District Council	0	GAT3	<p>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</p>	<p>The Borough Council will continue to liaise with the airport over the preparation of the airports parking strategy and will ensure that it is reviewed at the appropriate time to take into account growth to 35 mppa.</p>

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					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	0	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.	Noted.
Rob	Matthews	Gatwick Airport Ltd.	0	GAT3	The current draft policy GAT3 restricts all future new and replacement airport-related parking to within the airport boundary, demonstrating the need in the context of a sustainable approach to surface transport access to the airport. GAL fully supports the draft policy and the control it places over any future airport-related car parking proposed off-airport. GAL is committed to working with CBC to regulate and control the level of airport-related car parking provided compatible with mode share targets and aspirations, and where it can to support LPAs in enforcing against unauthorised car parking. As identified in the Gatwick Master Plan and ASAS, there is sufficient capacity on airport to accommodate the unauthorised off-airport parking, as well as future predicted demand, without 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.	Noted.
Rob	Matthews	Gatwick Airport Ltd.	0	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	An additional element has been added to the policy in relation to new office related development at the airport.

Gatwick Airport						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>prejudicing the current and future operational requirements of the airport.</p> <p>The current draft policy wording for GAT4 is as follows:</p> <p>“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.”</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>Expanding from these principles, GAL would also like to see greater flexibility for commercial use of other on-airport land and buildings, thereby allowing non-airport related commercial development to take place provided existing and future operational</p>	

Gatwick Airport						
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					requirements are not prejudiced. The following additional wording is suggested for Policy GAT4, to read as follows: SEE FULL REP	
Rob	Matthews	Gatwick Airport Ltd.	0	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>	Whilst the issue of aerodrome safeguarding is supported, as this matter is set out in a government circular it is not considered that a specific policy is required on this matter. However, reference could be made in the supporting text to the need to comply with aerodrome safeguarding requirements.
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	The Borough Council will liaise with Gatwick Airport over their proposals for Gatwick being proposed in the

Gatwick Airport						
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					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 operators and the Wilky Group. The airport's owners have recently confirmed that they will be preparing detailed plans for a second runway for consideration by the Davies 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.	context of the work of the Davies Commission and seek to contribute to the work of the Commission itself in the appropriate way and at the appropriate time. The Borough Council will continue to seek clarity on the issue of safeguarding.
Rob	Matthews	Gatwick Airport Ltd.	0		SEE FULL REP.... Promoting sustainable economic growth is a key priority which is reflected in national and local planning policy. The suggested alterations to GAT4 identified in these representations will conform with this priority and the objectives of other national and local policies. It has been identified that there is significant economic benefit that can be created by allowing non airport related commercial development within the airport boundary, without impacting the operational requirements of the airport now or in the future. Any proposals that come 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.	Noted.
John	Lister	Natural England	0		Airport parking should be located within the boundary of the airport to reduce congestion and promote "greener" travel arrangements.	Noted. The policy seeks to locate additional airport parking required as part of the overall transport strategy within the airport boundary.

Gatwick Airport						
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					Natural England support the encouragement of green travel arrangements.	
John	Lister	Natural England	0		Gatwick should remain a one runway, two terminal airport. This is not within the remit of Natural England	The Borough Council will be considering its response to the Davies Aviation Commission which is assessing the issue of runway capacity.

Neighbourhoods						
Names	Surname	Organisation	On behalf of	Neighbourhood	Comments	CBC Response
Jenny	Frost	Ifield Village Conservation Area Advisory Committee	0	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</p>	<p>Noted</p> <p>Noted. This section was for information purposes and will be removed for the Submission version. There was no specific reason for the omission.</p> <p>Noted. This extension to the Conservation Area has now been designated.</p> <p>Noted.</p>

Neighbourhoods						
Names	Surname	Organisation	On behalf of	Neighbourhood	Comments	CBC Response
					<p>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>	<p>Noted. If these properties are seen to be significant enough to be a "Heritage Asset" then they will benefit from protection from the overarching heritage policy. Otherwise they will benefit from other policies primarily in the Character chapter.</p>
Mark	Bewsey	Savills	Homes and Communities Agency	Northgate	<p>Comment – The Kilnmead site falls within the Northgate area. This site is suitable for a residential development and should therefore be included as a suitable and deliverable site within the list for the Northgate area on page 173. Part of the Gatwick Safeguarding Area falls within the Northgate area. Reference should be made to this under the 'Character and Environment' section on page 173.</p>	<p>Comment noted, The Council is currently looking at the capacity of this site in relation to Town Centre North with a view to identifying the site in the Submission Local Plan.</p>
Ian	Miller	Tinsley Lane Residents Association	0	Three Bridges	<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</p>	<p>Comments noted. The Council is currently liaising with the landowner (HCA) to bring forward the site for medium density residential development in conjunction with improved facilities for Oakwood Football Club. The provision on an equipped play area for children will be considered in the design and layout of any scheme including the provision of</p>

Neighbourhoods						
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					<p>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 have been identified as having development potential.</p> <p>Oakwood F.C. has several boys and girls football teams covering all age groups and provides an extremely valuable service in developing our young people but it needs more funding to bring its facilities up to modern standards. This was discussed with the previous owner, English Partnerships, and a draft development plan was proposed in 2003 to build houses on the north sports field while maintaining the southern half for recreation. This plan was however not considered to be viable at the time.</p> <p>Ideally these sports fields could be retained for recreation with enhanced facilities at Oakwood F.C. to include an open play area for children of residents. If this is not possible then a sustainable low density development project could be economically viable if a commuted payment from the development could be allocated to redevelop the Oakwood F. C. facilities in recognition of the contribution they make to the youth of the Borough. A low density would be necessary to avoid overloading the drainage and sewerage</p>	<p>affordable housing subject to viability.</p> <p>It is likely that a buffer from the ancient woodland and a management plan would be required as set out in Natural England's Standing Advice on Ancient Woodland.</p> <p>The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013) assess the needs and qualitative or quantitative deficits and surpluses of open space in Crawley. This ensures that there is an adequate supply of open space for the current and future population (including sports clubs) and makes the best use of land by identifying open spaces better suited to other uses.</p> <p>The development of this site would allow for part retention and enhancement of open space in line with the Council's standards on open space set out in the Open Space, Sport and Recreation Study. This may involve enhancing the quality of existing open spaces and facilities to encourage greater use of them.</p>

Neighbourhoods						
Names	Surname	Organisation	On behalf of	Neighbourhood	Comments	CBC Response
					<p>systems which are already close to capacity and the only practical traffic access would not be able to cope with any increase in usage without considerable adverse effect on existing properties.</p> <p>As the LDF has identified a shortage of skilled labour and of family homes this small site could be allocated for low level aspirational housing which respects the character of the surrounding area and minimises the impact on the adjacent bungalows.</p> <p>The proximity of the Manor Royal Business District makes it ideal to attract skilled workers and a safe walking distance to Hazelwick School makes the site ideal for family housing. 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>	
Brenda	Burgess			Three Bridges	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	There are no plans to redevelop the Three Bridges Station frontage. The Montefiore Institute is now part of the Hazelwick Road Conservation Area and as such any development proposals must protect or enhance the character or appearance of the area.
Brenda	Burgess			Three Bridges	Fewer office blocks unless we know they are going to be occupied.	Noted. The planning system is only able to assess a proposal on its individual merits, and cannot have regard to the likelihood of it's being let on the open market.
Brenda	Burgess			Three Bridges	Investigating the transformation of some office blocks to living space. If the old docks can be converted in London and other cities, then why	Noted. Recent changes to permitted development rights means that there is now scope for

Neighbourhoods						
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					not our obsolete unwanted office block, many of which are new.	disused office space to convert to residential without the need for planning permission.
Brenda	Burgess			Three Bridges	Bring forward the green fields of Tinsley lane. I don't just mean the football club. In fact I think that could stay as there are no other facilities for the young in that area. There are other fields owned by HCA - think rented to Rentakill at some point. It might mean adjusting the roads such as bringing through an access from one of the closes. During such a development, or even if one is not possible, we desperately need play areas in the Tinsley lane area. Tinsley lane is surrounded by major busy roads and there is no where locals for children to play safely.	Comment noted. The Council is currently liaising with the landowner (HCA) to bring forward the site for residential development. Achieving suitable access and equipped play areas for children will be considered as part of this process.
Brenda	Burgess			Three Bridges	Can we do anything about road improvements?	Noted. The transport assessment will consider a mitigation measures that are required as the result of the development in the local plan. The assessment will also identify areas which may become at capacity as a result of background traffic growth. The County Council will use the information to consider any potential for future improvements.
Brenda	Burgess			Three Bridges	Living in the Town centre? Might not be appropriate to have social housing in the area of Town centre.	Comment noted. Provision of affordable housing will be subject to viability considerations.
Brenda	Burgess			Three Bridges	Mixture of housing both Social and desirable.	Comment noted
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)	Comment noted.

Neighbourhoods						
Names	Surname	Organisation	On behalf of	Neighbourhood	Comments	CBC Response
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.	Comment noted. The Council is currently liaising with the landowner (HCA) to bring forward the site for residential development.
Collin	Lloyd			Tilgate	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>Protection of open space will be through:</p> <p>Policy ENV3 for those spaces demonstrably special to the local community and hold particular local significance.</p> <p>Policy ENV4 to ensure that any loss of open space is fully justified to be surplus to ensure valued sites are protected. This is underpinned by The Crawley Borough Council Open Space, Sport and Recreation Study (2013) and the Playing Pitch Study for Crawley Borough Council (2013)</p> <p>ENV5 to deliver open space to support growth of the town and mitigate impacts on existing facilities.</p> <p>All responses to this question have been noted and assessed whether it meets NPPF criteria para 77 or whether the Local Plan draft policies on open space and character (such as CH3, ENV1 and ENV4) provide the appropriate level of protection.</p>

Sustainability Appraisal						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner		It is noted that Sustainability Objective 4 seeks 'To ensure that everyone has the opportunity to live in a decent and affordable home'. This objective is strongly supported and entirely consistent with the NPPF. However in considering the housing strategy to supply just 245 units a year in Policy H1, it is not clear how the scoring is reflected (a single negative mark is given) in comparison with additional parking at Gatwick receives a double negative mark. This inconsistency needs to be addressed prior to submitting Crawley 2029 to the Secretary of State.	Comment noted. We believe that the aims of Sustainability Objective Four are strongly supported by government and the council agree that this objective should be strongly pursued, but the council also recognises both the environmental and administrative constraints of Crawley. It is recognised that Sustainability Objective Four is negatively impacted upon with regards to Policy H1 (Housing Provision), and moreover, the mitigation of this objective has yet to be assessed (this will be completed for the submission document). Subsequently, a revised SA will also include the proposed mitigation measures that may revise the impact of a number of Local Plan policies, including Policy H1.
Chris	Owen	West Sussex County Council	0	Appendix C	<p>Topic Area B – Heritage, Character, Design and Architecture</p> <p>Paragraph B8:</p> <p>The Crawley Extensive Urban Survey (EUS) is referenced as part of the Sussex EUS, which is noted and welcomed. However paragraph 170 of the NPPF refers to “landscape character assessments...integrated assessment of historic landscape character” and in this respect there is scope to refer to the Sussex Historic Landscape Characterisation (HLC) as a useful source of historic land use data and character outside the urban area. It is noted that the Sussex EUS is discussed in terms of “is being prepared” but it is</p>	Comment noted. We will refer to the Sussex Historic Landscape Characterisation (HLC) study, completed in 2010, within the SA. For the final version of this document, the council will ensure that this study is summarised. In addition, it is noted that Sussex EUS has now been completed and we will ensure that Paragraph B8 is updated accordingly.

Sustainability Appraisal						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					now complete and therefore 'is being...' should be changed to 'has been'.	
Chris	Owen	West Sussex County Council	0	Appendix C	<p>Topic Area F – Transport and Infrastructure</p> <p>Paragraph F14 - Table:</p> <p>It is suggested that the clarity of the indicator information given be reviewed including whether the indicator explains specifically what is measured e.g. under F3 it is not clear what the 81% (2008) figure for West Sussex actually means.</p> <p>Generally the data sources given refer to local information collected by WSCC rather than the NIs themselves. In some instances it may be worth reviewing whether there may be more up to date information available. For example, it is assumed that the rail use data comes from Office of Rail Regulation statistics available on the following website and the most recent data is from 2010/11: http://www.rail-reg.gov.uk/server/show/nav.1529</p> <p>It may be useful to take a look at West Sussex Local Transport Plan monitoring indicators which are the indicators that we are using in the absence of a National Indicator Set. These cover similar themes to those highlighted in the Sustainability Report. The most up-to-date monitoring will be posted on our website and updated periodically: http://www.westsussex.gov.uk/your_council/plans_projects_reports_and/plans/west_sussex_transport_plan/west_sussex_transport_plan_mon/west_sussex_transport_plan_mon.aspx</p>	<p>Comment noted. It is agreed that several of the indicators for the Sustainability Appraisal (SA) should be updated. In the absence of a National Indicator Set, the Council recognises that West Sussex County Council is a valuable resource for statistics regarding a wide range of topics, and in particular, transport. In addition, both the rail statistics web link and West Sussex Local Transport Plan monitoring figures will be introduced into the final version of this SA report, and moreover, it is recognised that the 2011 Census will also be a useful source of information in the future.</p>
Elizabeth	Burt	Savills	Crest Strategic Projects		CSP has reviewed the draft Sustainability Appraisal (SA) Report supporting the draft Local Plan. It supports paragraphs 2.16 and 2.17 that "Further growth into neighbouring authorities cannot be	Comments noted. The council acknowledges the implications of not meeting demographic housing needs over the plan period and is

Sustainability Appraisal						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
					<p>ruled out at this stage if further growth is required” (para 2.17). It goes on to state that therefore the draft SA could be applied to areas beyond the boundary of Crawley during the life of the plan and that the extent of the Plan area will be kept under review and updated as appropriate in future consultations. CSP supports the identification of the need to assess growth opportunities outside the Borough boundary, however it recommends that this assessment is undertaken now and potential sites outside the Borough identified to contribute towards the delivery of housing.</p> <p>CSP recognises that three key sustainability issues affecting the Borough are identified as housing stock not matching the need and aspirations of the Borough over the next 20 years, limited affordable housing which does not match need and limited land supply in the Borough. This clearly calls for policies, a housing target and housing delivery strategy, including the identification of suitable sites, which can address these issues within the lifetime of the plan.</p>	<p>actively working with adjoining local authorities across the Gatwick Diamond area to establish the extent to which housing needs can be met across the housing market area, rather than focusing on administrative boundaries, which do not reflect the fluid nature of the housing market. It is hoped that broad agreement on housing numbers across the Housing Market Area can be reached through the 'duty to co-operate' requirement in respect of strategic priorities and it is on this basis, that the Local Plan seeks to be positively prepared and compliant with the requirements of the NPPF (Para 178 and 182) and therefore found 'sound'. Both the amount and location of new housing outside of council's administrative boundary to meet Crawley's demographic housing needs remains unknown at this stage and it is this work which is required to enable agreement on housing numbers across the Gatwick Diamond area. Please also note that for the formal submission of the Local Plan, the council will also submit a Housing Implementation Strategy (HIS) compliant with the requirements of the NPPF (Para 47), describing how the council will maintain a five-year supply of housing land to meet our housing target.</p>

Evidence Base						
Names	Surname	Organisation	On behalf of	Policy	Comments	CBC Response
Jamie	Lewis	Hunter Page Planning Ltd	Private Landowner	Boundary Review	<p>It is noted that the Council undertook a boundary review to assist in identifying new sites for development and other uses. Whilst some land around the western fringes has been identified as having some potential, and that potential is not quantified precisely, it is considered this will not meet the identified shortfall. Given this, it is surprising that part of the land south of Antlands Lane which falls outside the airport safeguarding zone and adjacent to the north east sector, was not considered as part of the boundary review. This omission calls the soundness of this work into question and it should be reviewed accordingly.</p> <p>The owners of land south of Antlands Lane have previously submitted information that demonstrates that the site has no transport, landscape or ecological constraint that would preclude its development. That work also established that the site is within a sustainable location suitable and capable of accepting further development. The south eastern corner lies outside the airport safeguarding zone.</p>	<p>The purpose of the boundary review is to delineate the urban area from the rural fringe and countryside beyond to apply policies that reflect the objectives of the local plan and the NPPF. The purpose of the review was not to identify development sites, however whilst reviewing the boundary, potential sites to consider as part of the urban capacity study were identified and are now being considered for the site allocations consultation in May/June.</p>
Paul	Burgess	Lewis & Co Planning	Flint Cottage and Kilravock	Boundary Review	<p>SEE FULL REP.... "The draft Local Plan logically proposes to extend the settlement boundary to include the K2 Leisure Centre, Broadfield Park, Broadfield House, Thomas Bennett College, the A23 (and accompanying highway signage and infrastructure) and Tilgate Business Park. Whilst the houses adjacent to the A23 are predominantly surrounded by these developments they have not been included within the boundary. The inclusion of these dwellings would not only meet the Council's criteria for determining the built up area boundary but would be consistent with the approach taken elsewhere</p>	<p>Comment noted, the boundary of the built-up area and countryside will continue to be assessed in line with both the representations made and application of the NPPF. Any further amendments to the Built-Up Area Boundary will be reflected in the Submission Local Plan.</p>

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					in the Borough (e.g. Whitehall Drive). In order to be consistent in the approach taken, we therefore request that the settlement boundary is amended further to include these properties."	
Tony	Fullwood	Tony Fullwood Associates	Mr M Robinson	Boundary Review	The Built Up Area boundary should be amended to include Oaksworth and garden land, Worth to enable residential development (see Map at Appendix 1). The Borough Council has assessed the 13 hectare area currently outside the BUAB and within the M23 Motorway as a whole. This is not the only option which needs to be appraised. Indeed, this would not be the preferred option in respect of this objection. This objection seeks a minor amendment to more accurately define the built area at Worth and to reflect the potential of the Oaksworth site which is recognised in the Borough Council's evidence base... SEE FULL REP	The built-up area boundary review assessed the site as a whole but also considered previous consultation responses and site visits with interested parties on minor amendments in this area. The boundary of the built-up area and countryside will continue to be assessed in line with both the representations made and application of the NPPF.
Tony	Fullwood	Tony Fullwood Associates	Mrs J Williams	Boundary Review	The Built Up Area boundary should be amended to include land off Saxon Road, Worth to enable residential development (see Map at Appendix 1). The Borough Council has assessed the 13 hectare area currently outside the BUAB and within the M23 Motorway as a whole. This is not the only option which needs to be appraised. Indeed, this would not be the preferred option in respect of this objection. This objection seeks a minor amendment to more accurately define the built area at Worth and to reflect the potential of the Saxon Road site which is recognised in the Borough Council's evidence base. ...SEE REP FOR MORE	The Built-Up Area Boundary review assessed the site as a whole but also considered previous consultation responses and site visits with interested parties on minor amendments in this area. The boundary of the built-up area and countryside will continue to be assessed in line with both the representations made and application of the NPPF.
Katherine	Harrison	Surrey County Council	0	Draft Infrastructure Plan	With regard to waste management, there appears to be an error on page 10 of the Draft Infrastructure Plan where it is stated that general household waste goes to existing landfill in Warnham. This is contrary to the Environment	Noted.

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					Agency's Waste Data Interrogator 2010 which indicates that Crawley exported 15 tonnes of hazardous waste, 1,971 tonnes of inert waste and 19,282 tonnes of household / industrial and commercial (HIC) waste to Surrey in 2010. Almost all the HIC waste exported from Crawley to Surrey was disposed at Patteson Court Landfill, Redhill. Void space at Patteson Court landfill is coming under increasing pressure, and 75.5% of waste disposed of at this site came from outside Surrey in 2010. We therefore welcome the aim and strategic principle of the Plan to limit the generation of household and other waste as this will reduce the need to export waste to Surrey for final disposal.	
Chris	Owen	West Sussex County Council	0	Draft Infrastructure Plan	<p>Waste and Recycling Services Current provision: The following amendments to text are proposed (deletions are crossed through, additions are in red and underlined) –</p> <ul style="list-style-type: none"> Household Waste Recycling Site & Transfer Station, with a combined capacity of 45,000 tonnes per annum, opened in 20082006 on Manor Royaloff Metcalf Way. The Household Waste Recycling Site has a catchment area of 5 mileWaste and Recycling Services <p>Current provision:</p> <p>The following amendments to text are proposed (deletions are crossed through, additions are in red and underlined) –</p> <ul style="list-style-type: none"> Household Waste Recycling Site & Transfer Station, with a combined capacity of 45,000 tonnes per annum, opened in 2006 off Metcalf Way. The Household Waste Recycling Site has a catchment area of 5 miles. 	Noted.

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					<ul style="list-style-type: none"> • General household waste goes to existing landfill Brookhurst Wood near Horsham. Construction of a new waste treatment facility at Brookhurst Wood is programmed for completion in 2013. <p>Transport - Road</p> <p>Current provision:</p> <p>The following amendments to text are proposed –</p> <ul style="list-style-type: none"> • A23 runs in a north - south direction through the town <p>Transport – Rail</p> <p>Current provision:</p> <p>Southampton should be added to the list of principal destinations.</p> <ul style="list-style-type: none"> • General household waste goes to existing landfill in Warnhamat Brookhurst Wood near (Horsham District). Construction of a new waste treatment facility at Brookhurst Wood is programmed for completion in 2013. 	
Jane	Noble	West Sussex Local Access Forum	0	Draft Infrastructure Plan	<p>The Draft Infrastructure Plan states that there is already a good cycle network but recognises that as there are gaps there is potential for further improvement which is to be welcomed.</p> <p>The Forum feels the Plan should make reference to the West Sussex Rights of Way Improvement Plan (RoWIP), details of which can be found at: www.westsussex.gov.uk/rowip.</p>	Noted.
Elizabeth	Burt	Savills	Crest Strategic Projects	DRAFT PROPOSALS MAP	This map identifies that the Kilnwood Vale site is covered by a landscape character edge designation. There does not however appear to	The landscape character edge relates to assessment and guidance on the small area of

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					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.	rural fringe and relationship between Crawley's Urban area and rural fringe leading to the open countryside. In this instance the assessment reflects the forthcoming development at Kilnwood Vale.
Tony	Fullwood	Tony Fullwood Associates	Mr M Robinson	Draft Urban Capacity Study	Whilst undertaking the Built Up Area Boundary survey a small number of sites were highlighted for further assessment as part of the Urban Capacity Study. The Council have stated that whilst these sites may currently relate more to the countryside than the urban area, further assessment could allow a limited amount of development without impacting on the character of the area. A list of these sites will be assessed prior to the Site Allocations Consultation in Spring 2013. It is requested that the Oaksworth site is added to the list of sites for review.	The suitability of the land at Oaksworth for housing has previously been considered through the SHLAA process. This concluded that the site is unsuitable for housing development even at relatively low densities due to the impact of development on the church and Conservation Area. Given that the Built-Up Area Boundary is to remain unchanged, the site must be considered in terms of its suitability for housing, as development within the countryside. The NPPF (para 54) states that isolated development in the countryside should be avoided unless there are special circumstances such as the exceptional quality/nature of design or the re-use of redundant/disused buildings. Any scheme for residential development would need to be very carefully considered in terms of the scale, layout and design of any new dwellings and be particularly sensitive to the rural character of the area both in terms

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						of its urban fringe setting and location within the Conservation Area.
David	Hutchinson	Pegasus Group	Persimmon Homes and Taylor Wimpey	SHLAA	<p>SEE FULL REP -</p> <p>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.</p> <p>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 NES Sector site where they can be integrated into the master plan for the area.</p> <p>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 that affect the residual land (in particular safeguarding and noise from Gatwick Airport) and that the Council has identified land off Steers Lane for an additional 100 units. However it is considered that further development might be possible to the south east of the consented NES Site.</p>	<p>Comments noted. The Council would welcome the opportunity of dialogue with the consortium to enable any residual land within the North East Sector Allocation but outside of the permitted masterplan to be brought forward. It should be noted that the landowners of both areas of land (Steers Lane and Land to the South East of Heathy Farm) have submitted representations to the Local Plan requesting that their sites are identified as additional housing sites in the Submission Local Plan.</p>